

IN THE UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

-----X

NETCHOICE, LLC, d/b/a :
NetChoice, a 501(c)(6) :
District of Columbia :
organization, Computer & :
Communications Industry :
Association d/b/a CCIA, :
a 501(c)6 non-stock :
Virginia Corporation :
Plaintiffs, :
v. : Case No.
1:21-cv-00840-RP

KEN PAXTON, in his official :
capacity as Attorney General :
of Texas :
Defendant. :

	2	4
1	1	
2 Videotaped Deposition of Carl Szabo	2 A P P E A R A N C E S	
3 Washington, District of Columbia	3	
4 Wednesday, November 17, 2021	4 ON BEHALF OF THE PLAINTIFFS:	
5 3:12 p.m.	5 TODD DISHER, ESQUIRE	
6	6 LEHOTSKY KELLER LLP	
7 Pages 1 - 141	7 919 Congress Avenue	
8 Reported by: Susan E. Alldridge, RPR	8 Suite 1100	
9	9 Austin, TX 78701	
10	10 (512)840-9370	
11	11 todd@lehotskykeller.com	
12	12	
13	13 CHRISTOPHER MARCHESE, ESQUIRE	
14	14 NETCHOICE	
15	15 1401 K Street, NW	
16	16 Suite 502	
17	17 Washington, DC 20005	
18	18 (631)707-2315	
19	19 cmarchese@netchoice.org	
20	20	
21	21	
22	22	
	3	5
1 Deposition of Carl Szabo held at the offices	1	
2 of:	2 A P P E A R A N C E S, Cont.	
3	3	
4	4	
5 NetChoice	5 ON BEHALF OF THE DEFENDANT:	
6 1401 K Street, NW	6 BENJAMIN LYLES, ESQUIRE	
7 Suite 502	7 COURTNEY B. CORBELLO, ESQUIRE	
8 Washington, DC 20005	8 ATTORNEY GENERAL KEN PAXTON	
9	9 P.O. Box 12548	
10	10 Austin, TX 78711-2548	
11	11 (512)463-2798	
12 Pursuant to agreement, before Susan E. Alldridge,	12 benjamin.lyles@oag.texas.gov	
13 Notary Public in and for the District of Columbia.	13 courtney.corbello@oag.texas.gov	
14	14	
15	15 ALSO PRESENT:	
16	16 Gene Aronov, Videographer	
17	17	
18	18	
19	19	
20	20	
21	21	
22	22	

		6		8
1	CONTENTS			
2	EXAMINATION OF CARL SZABO	PAGE		
3	By Ms. Corbello	8		
4				
5				
6	E X H I B I T S			
7	(Attached to the transcript)			
8	SZABO DEPOSITION EXHIBIT	PAGE		
9	Exhibit Number 1 NetChoice, LLC's Declaration	36		
10	PROCEEDINGS			
11				
12	THE VIDEOGRAPHER: Good afternoon.			
13	This begins the video deposition of			
14	Carl Szabo taken by the defendants in the matter of			
15	NetChoice, LLC, et al., versus Ken Paxton, et al.,			
16	filed in the United States District Court for the			
17	Western District of Texas, Austin Division, Civil			
18	Action Number 1:21-cv-00840-RP.			
19	This deposition is being held at			
20	NetChoice located at 1401 K Street, Northwest,			
21	Suite 502, Washington, DC, on November 17th, 2021,			
22	at approximately 3:12 p.m.			
1	My name is Gene Aronov from the firm			
2	Integrity Legal Support Solutions, and I'm the legal			
3	video specialist.			
4	The court reporter is Sue Alldridge in			
5	association with Integrity Legal Support Solutions.			
6	Will counsel please introduce themselves.			
7	MR. DISHER: Todd Dishner for the			
8	plaintiffs.			
9	MS. CORBELLO: Courtney Corbello and			
10	Ben Lyles for Defendant.			
11	MR. MARCHESE: Chris Marchese for			
12	Plaintiff.			
13	THE VIDEOGRAPHER: Will the court			
14	reporter please swear in the witness.			
15	-----			
16	CARL SZABO			
17	was called as a witness and, after having been			
18	first duly sworn, testified as follows:			
19	-----			
20	E X A M I N A T I O N			
21	BY MS. CORBELLO:			
22	Q Good afternoon, Mr. Szabo.			
1	Can you state and spell your name for the			
2	record, please.			
3	A My name is Carl Szabo. C-A-R-L, S, as in			
4	Sam, Z, as in zebra, A, as in apple, B, as in boy,			
5	O, as in October.			
6	Q Thank you.			
7	Carl, have you ever taken a deposition			
8	before?			
9	A I have not taken a deposition before.			
10	Q Okay. Well, I'm happy to go over the			
11	rules with you.			
12	You're also an attorney; correct?			
13	A I am also an attorney, yes.			
14	Q Okay. Would you like me to skip past the			
15	rules, or do you want to go over them just to be			
16	sure?			
17	A Please go over the rules.			
18	Q Okay. So do you understand that your			
19	testimony given today in this deposition is the same			
20	as if you were testifying on the stand in a			
21	courtroom right now?			
22	A I understand that.			
1	Q Okay. For the purposes of the court			
2	reporter, one of the big rules is wait for me to			
3	finish a question, and then you answer. And try not			
4	to talk over each other as much as possible so we			
5	don't drive her insane.			
6	Fair enough?			
7	A I agree not to drive the court reporter			
8	insane.			
9	Q If you need a break -- I try to take a			
10	break about every hour or so. But if you need one			
11	at a different time, all I ask is that you finish			
12	answering whatever question I've put on the table,			
13	and then after that we can take a break.			
14	Fair enough?			
15	A Understood.			
16	Q If you do not understand my question or			
17	if you need me to rephrase it in any way, I'm			
18	pleased to do so. Please tell me whatever issues			
19	you might have with the question or if it's unclear			
20	to you in any way.			
21	Can I expect you to do that?			
22	A Yes, you can.			

<p>1 Q And if you answer my questions directly, 2 is it fair for me to assume that you understand the 3 question that I've posed to you?</p> <p>4 A Yes, it is.</p> <p>5 Q Are you on any medications today that 6 would alter your ability to truthfully testify 7 today?</p> <p>8 A No.</p> <p>9 Q What is your -- your current job title?</p> <p>10 A My current job title --</p> <p>11 Q Yes.</p> <p>12 A -- is vice president and general counsel 13 for NetChoice.</p> <p>14 Q How long have you been in that position?</p> <p>15 A Over ten years.</p> <p>16 Q How long specifically?</p> <p>17 A Ten years and approximately eight months.</p> <p>18 Q And were you with NetChoice before that 19 role?</p> <p>20 A Yes.</p> <p>21 Q What was your role at NetChoice 22 previously?</p>	<p>10 1 Illinois.</p> <p>2 Q Oh, what law firm?</p> <p>3 A The law firm of Wildman, Harrold, Allen 4 and Dickson.</p> <p>5 Q What law school did you go to?</p> <p>6 A I went to the Catholic University law 7 school.</p> <p>8 Q Where is that?</p> <p>9 A That is in Washington, DC.</p> <p>10 Q Your current job is VP and general 11 counsel for NetChoice.</p> <p>12 What do -- what are your job duties in 13 those titles?</p> <p>14 A Some of my job duties include managing 15 the legal team at NetChoice. It also involves 16 meeting with clients -- or -- sorry -- meeting with 17 members. I apologize -- meeting with members, 18 membership development.</p> <p>19 It involves speaking with reporters on 20 issues that matter. It also involves advocacy for 21 our members and on the issues of free expression and 22 free enterprise on the internet.</p>
<p>11 1 A Previously, before becoming vice 2 president and general counsel --</p> <p>3 Q Yes.</p> <p>4 A -- my role was as policy counsel.</p> <p>5 Q What does that job -- that job entail?</p> <p>6 A That job entails analyzing legislation, 7 advising the NetChoice employees as well as the 8 NetChoice president, as well as having conversations 9 with members and discussing impending legislation, 10 its legal impact.</p> <p>11 We've engaged in legal activity and a 12 myriad of other engagements.</p> <p>13 Q How long were you a policy counsel for at 14 NetChoice before becoming VP?</p> <p>15 A I do not know exactly, but approximately 16 four to six years.</p> <p>17 Q And prior to being policy counsel, what 18 was your job title?</p> <p>19 A I was not working at NetChoice prior to 20 becoming policy counsel for NetChoice.</p> <p>21 Q Where were you working?</p> <p>22 A I was working at a law firm in Chicago,</p>	<p>11 13 1 Q I noticed you post quite a few articles 2 on the NetChoice website.</p> <p>3 Is that part of your job duties?</p> <p>4 A Part of my job duties is advocacy for 5 free expression and free enterprise. That can 6 include publication of articles, statements in the 7 media, appearances on TV and also on radio.</p> <p>8 Q Have you testified in front of Congress 9 before?</p> <p>10 A Which Congress? The --</p> <p>11 Q Let's start with the U.S.</p> <p>12 A I've testified before the U.S. House of 13 Representatives as well as the United States Senate.</p> <p>14 Q For your testimony at the House of 15 Representatives, what was the topic for each time 16 that you appeared?</p> <p>17 A I testified once at the U.S. House of 18 Representatives. It was either Energy and Commerce 19 committee or Judiciary committee. I can't recall 20 off the top of my head. And the issue was on 21 antitrust.</p> <p>22 Q And what about the Senate? How many</p>

<p>1 times did you testify there, and what were the 2 topics?</p> <p>3 A I have testified once before the Senate. 4 It was the Senate Judiciary committee. And that was 5 on the issue of online advertising, the online 6 advertising ecosystem, as well as issues of 7 government enforcement of antitrust law.</p> <p>8 Q What year did that Senate testimony take 9 place?</p> <p>10 A I do not recall off the top of my head 11 what year. It was during COVID, however.</p> <p>12 Q It's sad that that's a time frame I 13 understand.</p> <p>14 What about state legislatures?</p> <p>15 Have you testified in front of any state 16 legislatures before?</p> <p>17 A I testified before many state 18 legislatures.</p> <p>19 Q Let's start with Texas.</p> <p>20 Have you ever testified before the Texas 21 legislature?</p> <p>22 A I have testified before the Texas</p>	<p>14</p> <p>1 A I have testified before the Florida 2 legislature on the issue of what happens to your 3 digital assets when you die.</p> <p>4 Q Any other topics that you've testified 5 on?</p> <p>6 A I have testified before the Florida 7 legislature on the issue of data breach legislation.</p> <p>8 Q Anything else?</p> <p>9 A I have testified before the Florida 10 legislature on the social media law in the state of 11 Florida.</p> <p>12 Q When you say "social media law," is that 13 the one that is the subject of NetChoice versus 14 Moody that's currently ongoing right now in federal 15 court?</p> <p>16 A That is the issue on which I testified, 17 yes.</p> <p>18 Q What other issues have you testified on 19 before the Florida legislature?</p> <p>20 A That is all that I recall at this time.</p> <p>21 Q Have you testified before the California 22 legislature before?</p>
<p>1 legislature.</p> <p>2 Q Okay. And who did you testify before?</p> <p>3 A I do not recall.</p> <p>4 Q Do you remember the topics?</p> <p>5 A I believe one of the issues was on the 6 question of taxation. I do not recall which 7 subdivision it was on.</p> <p>8 Q Taxation of who exactly?</p> <p>9 A I don't remember.</p> <p>10 Q Do you recall approximately what year 11 this was?</p> <p>12 A It was before COVID. But, no, I don't 13 recall the exact year.</p> <p>14 Q Have you provided any other testimony at 15 the Texas legislative level over than this taxation 16 one you just mentioned?</p> <p>17 A Not to my knowledge.</p> <p>18 Q Have you testified before in front of the 19 Florida legislature?</p> <p>20 A Yes, I've testified before the Florida 21 legislature.</p> <p>22 Q And what was that testimony for?</p>	<p>15</p> <p>1 A I do not recall.</p> <p>2 Q Have you provided any testimony before 3 the California legislature on the California privacy 4 act?</p> <p>5 A I do not recall.</p> <p>6 Q Did NetChoice engage in any lobbying 7 activities while the California privacy act was 8 passing through the legislative process?</p> <p>9 MR. DISHER: Objection. Form.</p> <p>10 Objection. Scope.</p> <p>11 Go ahead and answer.</p> <p>12 THE WITNESS: What do you mean by 13 "lobbying"?</p> <p>14 BY MS. CORBELLO:</p> <p>15 Q Well, we'll back up.</p> <p>16 NetChoice is a trade association.</p> <p>17 What does NetChoice do?</p> <p>18 A NetChoice promotes free expression and 19 free enterprise on the internet.</p> <p>20 Q And how does it do that?</p> <p>21 A By advocating with state/federal 22 lawmakers through engagement on legal actions, if</p>

<p>1 necessary, and through education of individuals as 2 well as lawmakers.</p> <p>3 Q So the activities you just described, 4 advocating and education, did you engage in any of 5 those activities in relation to the California 6 privacy act?</p> <p>7 MR. DISHER: Objection. Scope. 8 Go ahead.</p> <p>9 THE WITNESS: I recall that we engaged 10 in -- or to the best of my knowledge, I believe we 11 filed and published an op-ed on the California 12 Consumer Privacy Act.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Thank you. I was just about to clarify 15 that.</p> <p>16 So I think I used kind of a vague way of 17 expressing -- of naming that law.</p> <p>18 When I said "California privacy act," you 19 understood me to mean the California Consumer 20 Protection Act; correct?</p> <p>21 A Correct.</p> <p>22 Q What other -- besides advocating and</p>	<p>18</p> <p>1 A Much of NetChoice goals are centered 2 around engaging directly with individuals.</p> <p>3 Q So what resources are used in order to do 4 that?</p> <p>5 A I don't think that's necessarily within 6 the scope of what we covered in my declaration.</p> <p>7 Q Can you go ahead and answer the question, 8 Mr. Szabo?</p> <p>9 MR. DISHER: Objection. Scope. 10 Go ahead and answer if you can.</p> <p>11 THE WITNESS: We sometimes engage in 12 flying NetChoice employees to various parts of the 13 country to engage directly. We attend meetings and 14 events.</p> <p>15 BY MS. CORBELLO:</p> <p>16 Q Any other resources?</p> <p>17 MR. DISHER: Objection. Scope. 18 Go ahead and answer.</p> <p>19 THE WITNESS: We sometimes retain outside 20 counsel.</p> <p>21 BY MS. CORBELLO:</p> <p>22 Q I'm sorry. Go ahead.</p>
<p>19</p> <p>1 education, are there any other activities that 2 NetChoice engages in in order to meet its goals that 3 you've told me about?</p> <p>4 A We spend considerable resources trying to 5 meet with proponents and opponents of legislation to 6 better identify concerns, identify potential 7 unintended consequences of legislation, as well as 8 to discuss the impact of enacted legislation.</p> <p>9 Q When you say "resources," what sort of 10 resources are you talking about?</p> <p>11 A We spend human capital in the form of 12 assigning NetChoice employees and -- to work on 13 these various issues.</p> <p>14 We engage in creation of original content 15 from NetChoice such as one papers -- or -- sorry -- 16 one-pagers, legal analyses such as law review 17 articles, as well as occasionally printing copies 18 and sharing them with those who are interested in 19 learning more.</p> <p>20 Q Other than human capital, what other 21 resources are expended in order to meet NetChoice's 22 goals?</p>	<p>21</p> <p>1 A And we sometimes do paid advertisements 2 through services like Facebook and Twitter.</p> <p>3 Q Besides Facebook and Twitter, what other 4 platforms does NetChoice pay for advertisement?</p> <p>5 A Hulu. And that is all that I know.</p> <p>6 Q What are -- what are these advertisements 7 advertising exactly?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: These advertisements are 10 advertising and promoting the core values of 11 NetChoice, which are free expression and free 12 enterprise on the internet.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Are the advertisements aimed at the 15 public at large, or is there a specific demographic 16 that you're trying to reach with these 17 advertisements?</p> <p>18 MR. DISHER: Objection. Form.</p> <p>19 Objection. Scope.</p> <p>20 Go ahead and answer if you can.</p> <p>21 THE WITNESS: I don't know specifically 22 who we are trying to target and who we are trying to</p>

<p>1 reach.</p> <p>2 BY MS. CORBELLO:</p> <p>3 Q Do the ads solicit money in any way?</p> <p>4 A Not to my knowledge.</p> <p>5 Q Do they request donations in any way?</p> <p>6 A Not to my knowledge.</p> <p>7 Q Do they provide viewers of the</p> <p>8 advertisements direction on how to provide donations</p> <p>9 to NetChoice?</p> <p>10 A Not to my knowledge.</p> <p>11 Q How does NetChoice receive any funding or</p> <p>12 income?</p> <p>13 MR. DISHER: Objection form. Objection.</p> <p>14 Scope.</p> <p>15 THE WITNESS: NetChoice receives</p> <p>16 membership dues.</p> <p>17 BY MS. CORBELLO:</p> <p>18 Q Does NetChoice receive any other form of</p> <p>19 revenue other than from membership dues?</p> <p>20 A NetChoice receives revenue from NetChoice</p> <p>21 members primarily who support and promote our</p> <p>22 mission of free expression and free enterprise.</p>	<p>22</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Which members do you have confidentiality</p> <p>3 agreements with?</p> <p>4 MR. DISHER: Objection. Form.</p> <p>5 Objection. Scope.</p> <p>6 I will instruct the witness not to answer</p> <p>7 to the extent that it will disclose information</p> <p>8 outside of the declaration that is not covered by</p> <p>9 the Court's order restricting this deposition to</p> <p>10 topics covered in the declaration.</p> <p>11 To the extent you can disclose the</p> <p>12 identities of those individual companies or entities</p> <p>13 you might have non-disclosure agreements with</p> <p>14 without violating the non-disclosure agreement</p> <p>15 itself, I will allow you to do that.</p> <p>16 To the extent that the existence of those</p> <p>17 non-disclosure agreements itself is somehow</p> <p>18 protected or confidential outside the scope of your</p> <p>19 declaration, I'll instruct you not to answer the</p> <p>20 question.</p> <p>21 THE WITNESS: Being unable to review</p> <p>22 those documents in preparation for this deposition,</p>
<p>1 Q And what are the other sources of revenue</p> <p>2 other than the membership dues?</p> <p>3 MR. DISHER: Objection. Form.</p> <p>4 Objection. Scope.</p> <p>5 THE WITNESS: We receive, sometimes,</p> <p>6 additional revenue in pursuit of specific projects</p> <p>7 directed towards promoting free expression and free</p> <p>8 enterprise.</p> <p>9 BY MS. CORBELLO:</p> <p>10 Q And where does that revenue come from?</p> <p>11 Is it a company or an individual?</p> <p>12 MR. DISHER: Same objections.</p> <p>13 THE WITNESS: They come from companies.</p> <p>14 BY MS. CORBELLO:</p> <p>15 Q Which companies provide that sort of</p> <p>16 revenue that you just described?</p> <p>17 MR. DISHER: Objection. Form.</p> <p>18 Objection. Scope.</p> <p>19 THE WITNESS: I believe to answer that</p> <p>20 would violate confidentiality agreements I have with</p> <p>21 members.</p> <p>22</p>	<p>23</p> <p>1 given that those non-disclosure agreements are</p> <p>2 outside the scope of my declaration, I did not</p> <p>3 review them prior to this deposition. So I cannot,</p> <p>4 with confidence, ensure that answering your</p> <p>5 questions will not violate my disclosure agreements.</p> <p>6 MS. CORBELLO: Okay. And just for the</p> <p>7 record, we'll preserve our objection to the</p> <p>8 instruction not to answer there.</p> <p>9 BY MS. CORBELLO:</p> <p>10 Q Sorry. Can you tell me one more time?</p> <p>11 You -- what was this -- this revenue that</p> <p>12 we just had this little dispute over, what was that</p> <p>13 for?</p> <p>14 I didn't have the time to write it down.</p> <p>15 MR. DISHER: Objection. Form.</p> <p>16 Objection. Scope.</p> <p>17 THE WITNESS: Additional funding to</p> <p>18 promote our mission of free expression and free</p> <p>19 enterprise.</p> <p>20 BY MS. CORBELLO:</p> <p>21 Q How does that specific funding promote</p> <p>22 free expression and free enterprise?</p>

<p>1 MR. DISHER: Same objections. 2 THE WITNESS: It enables us to address 3 increased threats to free expression and free 4 enterprise on the internet. 5 BY MS. CORBELLO: 6 Q How -- how specifically are those 7 increased threats addressed? 8 MR. DISHER: Objection. Form. 9 Objection. Scope. 10 THE WITNESS: We sometimes -- rephrase. 11 We use the funding in part to enable us 12 to engage at events, to travel for purposes of 13 testimony, and to promote our core values of free 14 expression and free enterprise. 15 BY MS. CORBELLO: 16 Q And when you say "increased threats," can 17 you give me an example of something that NetChoice 18 sees as an increased threat? 19 A An example of an increased threat would 20 be legislation that violates the editorial rights of 21 our members in conflict with their constitutional 22 rights given under the First Amendment.</p>	<p>26</p> <p>1 there two different categories for NetChoice? 2 And if there's -- if they're not, that's 3 fine. If they're all increased threats, you can 4 tell me that. 5 But are there some threats that are seen 6 as the increased threats versus just an ordinary 7 threat, for lack of a better word? 8 Does that make sense? 9 A Yes. 10 A threat would be a piece of legislation 11 that is moving. That threat is increased when that 12 piece of legislation becomes law. That is an 13 example of an increased threat. 14 Q Thank you. 15 This additional revenue we've been 16 talking about, is that used to fund litigation 17 brought by NetChoice? 18 MR. DISHER: Objection. Form. 19 Objection. Scope. 20 THE WITNESS: I do not know if answering 21 that question will violate my NDA with members. 22</p>
<p>27</p> <p>1 Q Can you give me an example of something 2 that would not fall into that category and, yet, 3 NetChoice would still be, in whatever way, working 4 to address it? 5 A Another example would be a state 6 attempting to apply discriminatory taxes to digital 7 advertisements exclusively in violation of the 8 Permanent Internet Tax Fairness Act. 9 Q And this might be my fault, but are you 10 saying that that's not an increased threat to 11 NetChoice? 12 MR. DISHER: Objection. Form. 13 THE WITNESS: A law that violates our 14 members' constitutional protections, whether it is 15 for digital ads or for their right to engage in 16 editorial discretion with respect to the content on 17 their services, are both threats to NetChoice 18 members. 19 BY MS. CORBELLO: 20 Q Understood. 21 But the phrase you used was "increased 22 threats." So I guess I'm trying to understand. Are</p>	<p>29</p> <p>1 BY MS. CORBELLO: 2 Q Understood. 3 The membership dues that NetChoice 4 receives, are the membership dues the same across 5 all members? 6 A Membership dues are the same across all 7 members. 8 Q All members pay the exact same amount -- 9 amount in terms of membership dues? 10 A All members are charged the same amount 11 in membership dues. 12 Q Regardless of the members' size or market 13 power; is that right? 14 A Regardless of members' market size or 15 market power, they are all charged the same 16 membership dues. 17 Q And they all pay the same dollar amount 18 for membership dues; is that right? Your members? 19 A To the extent that some members may not 20 be able to afford a membership, we have, rarely, 21 offered discounts. However, the membership dues 22 remain the same for all members.</p>

<p>1 Q And I -- just to clarify, when you say 2 "the same," are you saying the same in terms of 3 dollar amount?</p> <p>4 A The same dollars for annual dues is what 5 I meant by "the same."</p> <p>6 Q Thank you.</p> <p>7 I'm sure you understand, CCIA is the 8 other plaintiff in this matter; correct?</p> <p>9 A CCIA is our co-plaintiff in this lawsuit.</p> <p>10 Q Are you currently -- is NetChoice 11 currently a plaintiff -- or co-plaintiff with CCIA 12 in any other litigation?</p> <p>13 A NetChoice and CCIA are co-plaintiffs in 14 our litigation against Moody.</p> <p>15 Q That's the Florida litigation you're 16 talking about?</p> <p>17 A Correct.</p> <p>18 Q Any other litigation besides the Moody 19 case that NetChoice and CCIA are currently 20 co-plaintiffs on?</p> <p>21 A Not to my knowledge.</p> <p>22 Q Has NetChoice and CCIA been co-plaintiffs</p>	<p>30</p> <p>1 A We have posted a tweet on Twitter, for 2 example, of how we think about the CCIA document and 3 provided a link to that document.</p> <p>4 Q Does NetChoice pay any of its members to 5 promote either NetChoice's content or CCIA's content 6 on their platforms?</p> <p>7 MR. DISHER: Objection. Form.</p> <p>8 Objection. Scope.</p> <p>9 THE WITNESS: In what way do you mean pay 10 our members?</p> <p>11 BY MS. CORBELLO:</p> <p>12 Q Well, similarly to the way advertisers 13 would pay to have their content on a social media 14 platform, is NetChoice paying any of their members 15 in order to promote the content we just talked about 16 so that it maybe is more easily seen by users or 17 appears higher up in a search engine search?</p> <p>18 Does that make sense?</p> <p>19 MR. DISHER: Same objections.</p> <p>20 THE WITNESS: NetChoice does, on 21 occasion, pay for advertising.</p> <p>22</p>	<p>32</p>
<p>1 on any past, now-completed litigation?</p> <p>2 A Not -- not that I'm aware of.</p> <p>3 Q Does NetChoice partner with CCIA in any 4 other context besides this lawsuit or the Florida 5 lawsuit?</p> <p>6 MR. DISHER: Objection. Form.</p> <p>7 THE WITNESS: What do you mean by 8 "partner"?</p> <p>9 BY MS. CORBELLO:</p> <p>10 Q I mean that term as broadly as possible.</p> <p>11 Are there any other avenues in which 12 NetChoice and CCIA have chosen to partner up in any 13 way, whether it's sharing of resources, sharing of 14 ideas, any -- any way that you can interpret the 15 word "partner."</p> <p>16 A NetChoice and CCIA have promoted one 17 another's content at times. For example, if CCIA 18 releases an interesting article or publication, we 19 have used social media to raise awareness of that 20 publication.</p> <p>21 Q And when you say "used social media," 22 what does that mean?</p>	<p>31</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Does NetChoice's ability to advertise 3 with any of its members play any role in the 4 membership of these members to NetChoice's trade 5 association?</p> <p>6 MR. DISHER: Objection. Form.</p> <p>7 THE WITNESS: Can you clarify the 8 question, please?</p> <p>9 BY MS. CORBELLO:</p> <p>10 Q Well -- so NetChoice's members pay dues; 11 correct?</p> <p>12 A NetChoice's members pay dues.</p> <p>13 Q And then they are considered members of 14 NetChoice; right?</p> <p>15 MR. DISHER: Objection. Form.</p> <p>16 THE WITNESS: NetChoice's members pay 17 dues, and they agree to support our mission of 18 promoting free expression and free enterprise.</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q And as part of membership into 21 NetChoice's -- into the trade association that is 22 NetChoice, are members required or obligated in any</p>	<p>33</p>

<p>1 way to advertise for NetChoice on their platforms?</p> <p>2 MR. DISHER: Object to form. Object to</p> <p>3 scope.</p> <p>4 THE WITNESS: Are you asking a quid pro</p> <p>5 quo? Is that the suggestion?</p> <p>6 BY MS. CORBELLO:</p> <p>7 Q I don't think it necessarily has to be a</p> <p>8 quid pro quo. But to me it seems like there can</p> <p>9 either be -- there's the membership side. Your</p> <p>10 members benefit. NetChoice, you know, works on</p> <p>11 behalf of its members to achieve its goals. And</p> <p>12 then NetChoice also operates, as any advertiser</p> <p>13 would, to pay the members it wants to to advertise</p> <p>14 on those platforms.</p> <p>15 Are these two separate activities that</p> <p>16 NetChoice engages in, or is one part of the other?</p> <p>17 A NetChoice advertises where we think it</p> <p>18 will be most effective.</p> <p>19 Q And are your members obligated in any way</p> <p>20 to host that advertisement as a result of being</p> <p>21 members of NetChoice?</p> <p>22 A NetChoice has had advertisements rejected</p>	<p>34</p> <p>1 A Not to my knowledge.</p> <p>2 Q I've left you a binder there for the sake</p> <p>3 of ease. And I'm going to hand you very quickly</p> <p>4 what's been -- will be marked as Defense Exhibit 1</p> <p>5 in a moment.</p> <p>6 (Szabo Deposition Exhibit 1 was marked</p> <p>7 for identification and attached to the transcript.)</p> <p>8 BY MS. CORBELLO:</p> <p>9 Q I'll ask you to just look this over.</p> <p>10 A Thank you.</p> <p>11 Q And -- oh, yeah. Feel free to look at</p> <p>12 the other pile, if you'd like.</p> <p>13 MR. DISHER: This is in tab 4 of the</p> <p>14 binder?</p> <p>15 MS. CORBELLO: Yes.</p> <p>16 MR. DISHER: Okay.</p> <p>17 BY MS. CORBELLO:</p> <p>18 Q If you could just verify that that marked</p> <p>19 exhibit is your declaration for the purposes of the</p> <p>20 court reporter. And then for ease, if you'd like to</p> <p>21 follow along in tab 4 instead, you could do that.</p> <p>22 Just let me know when you're done</p>
<p>35</p> <p>1 when we try to publish them on members' sites.</p> <p>2 Q What were those advertisements rejected</p> <p>3 for?</p> <p>4 A I do not recall.</p> <p>5 Q Do you -- are there any documents that</p> <p>6 would help you to recall?</p> <p>7 MR. DISHER: Object to form. Object to</p> <p>8 scope.</p> <p>9 THE WITNESS: Not particularly, no.</p> <p>10 BY MS. CORBELLO:</p> <p>11 Q NetChoice doesn't keep any record of the</p> <p>12 advertisements it attempts to submit to platforms?</p> <p>13 MR. DISHER: Objection. Form.</p> <p>14 Objection. Scope.</p> <p>15 THE WITNESS: Not to my knowledge.</p> <p>16 BY MS. CORBELLO:</p> <p>17 Q We talked about one way in which CCIA and</p> <p>18 NetChoice partner with each other outside of the</p> <p>19 context of the lawsuits they're currently engaged in</p> <p>20 just promoting each other's content.</p> <p>21 Are there any other ways in which CCIA</p> <p>22 and NetChoice partner currently?</p>	<p>37</p> <p>1 reviewing that.</p> <p>2 MS. CORBELLO: Todd, do you mind if we go</p> <p>3 off the record so we can give Mr. Szabo as much time</p> <p>4 as he needs to review?</p> <p>5 MR. DISHER: That's fine.</p> <p>6 THE VIDEOGRAPHER: We're going off the</p> <p>7 record.</p> <p>8 The time is 3:49 p.m.</p> <p>9 (Off the record.)</p> <p>10 THE VIDEOGRAPHER: We're back on the</p> <p>11 record.</p> <p>12 The time is 3:50 p.m.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Mr. Szabo, now that you've had a chance</p> <p>15 to look at it, is the document I handed you marked</p> <p>16 as Defense Exhibit 1 a true and correct copy of the</p> <p>17 declaration you submitted in support of Plaintiffs'</p> <p>18 motion for preliminary injunction in this case?</p> <p>19 A Yes.</p> <p>20 Q You can go ahead and, if you want, hand</p> <p>21 that to the court reporter and use the tab instead.</p> <p>22 A Thank you.</p>

<p>1 Q I want to turn you first to paragraph 2. 2 If you need a second to read that, let me know. 3 Are you ready? 4 So here in paragraph 2 you're talking 5 about advocacy before legislative bodies, courts, 6 and government agencies. 7 Can you tell me what kind of advocacy was 8 done, in relation to HB20 as it was passing through 9 the legislative process, by NetChoice? 10 MR. DISHER: Objection. Form. 11 Objection. Scope. 12 THE WITNESS: NetChoice testified before 13 the Texas legislature in opposition to HB20. 14 BY MS. CORBELLO: 15 Q What other advocacy measures did 16 NetChoice take in relation to HB20 while it was 17 passing through the legislative process? 18 MR. DISHER: Same objections. 19 THE WITNESS: NetChoice engaged in 20 publishing an editorial outlining how HB20 would, in 21 part -- sorry. NetChoice filed -- I'm sorry. 22 NetChoice published an op-ed outlining how HB20</p>	<p>38 1 you to recall? 2 MR. DISHER: Objection. Scope. 3 THE WITNESS: For purposes of this 4 declaration, I looked at -- sorry. For purposes of 5 this deposition, I instead focused primarily on the 6 issues covered in my declaration. 7 Seeing as how this editorial was 8 published before enactment of the law, it did not 9 seem pertinent and is not pertinent to the scope of 10 my declaration. 11 BY MS. CORBELLO: 12 Q I understand that you may not have 13 reviewed any documents regarding the editorial. 14 However, my question was a little bit different. 15 Are there any documents -- and you can 16 simply name them or identify them in any way 17 possible -- that would help you to recall the facts 18 that I've asked you about in regards to this 19 editorial? 20 MR. DISHER: Objection. Form. 21 THE WITNESS: The publicly available 22 newspaper in which it was published would allow me</p>
<p>39 1 violates the editorial discretion of NetChoice 2 members and would lead to the production of lawful 3 but awful content on the internet. 4 BY MS. CORBELLO: 5 Q Where was this op-ed published? 6 A I do not recall. 7 Q Did NetChoice pay to promote this op-ed 8 in any way? 9 MR. DISHER: Objection. Form. 10 THE WITNESS: I do not know. 11 BY MS. CORBELLO: 12 Q And was it just one editorial that was 13 published in relation to HB20 as it was passing 14 through the legislative process? 15 A I do not know. 16 Q You don't know of any other editorials 17 that were published at that time? 18 A Not off the top of my head, no. 19 Q Is -- the editorial you just spoke about, 20 is that one that you drafted yourself? 21 A I do not recall. 22 Q Are there any documents that would help</p>	<p>39 1 to recall those facts. 2 BY MS. CORBELLO: 3 Q Any other documents you could think of? 4 A Not off the top of my head. 5 Q Other than testifying in opposition to 6 HB20 and publishing this editorial we just spoke 7 about, are there any other advocacy actions that 8 NetChoice took in relation to HB20 as it passed 9 through the legislative process? 10 MR. DISHER: Objection. Scope. 11 THE WITNESS: We spoke with members about 12 how this legislation would impact their ability to 13 engage in their editorial discretion guaranteed 14 under the First Amendment, how it would permanently 15 impact their ability to not only find customers and 16 advertisers but would actually have a detrimental 17 value on their brand, as well as violate their 18 ability to engage in editorial conduct as they see 19 fit. 20 BY MS. CORBELLO: 21 Q Any other advocacy action that NetChoice 22 took in relation to HB20 while it was passing</p>

<p>1 through the legislative process?</p> <p>2 MR. DISHER: Objection. Scope.</p> <p>3 THE WITNESS: Not off the top of my head,</p> <p>4 no.</p> <p>5 BY MS. CORBELLO:</p> <p>6 Q Did NetChoice pay any opposition -- any</p> <p>7 groups that were in opposition to HB20 in relation</p> <p>8 to HB20 passing through the legislative process?</p> <p>9 MR. DISHER: Same objection.</p> <p>10 THE WITNESS: Is it -- did we pay any</p> <p>11 groups who opposed? Is that the question?</p> <p>12 BY MS. CORBELLO:</p> <p>13 Q Well, I understand that there might be</p> <p>14 groups who opposed HB20 but, perhaps, NetChoice</p> <p>15 didn't pay them because of that opposition. Maybe</p> <p>16 something else.</p> <p>17 So I tried to qualify it the best I</p> <p>18 could. Unfortunately, I had to use a lot of the</p> <p>19 same words.</p> <p>20 Did NetChoice pay any groups opposed to</p> <p>21 HB20 in relation to that opposition to HB20?</p> <p>22 Does that make more sense?</p>	<p>42</p> <p>1 Who initiated those conversations? Was</p> <p>2 it NetChoice or its members?</p> <p>3 MR. DISHER: Objection. Form.</p> <p>4 THE WITNESS: NetChoice engaged its</p> <p>5 members to discuss how HB20 might impact them.</p> <p>6 BY MS. CORBELLO:</p> <p>7 Q And when you use the word "engaged," you</p> <p>8 mean NetChoice initiated the conversations with its</p> <p>9 members?</p> <p>10 A NetChoice did initiate conversations with</p> <p>11 its members on how HB20 would impact their ability</p> <p>12 to engage in editorial discretion over the content</p> <p>13 on their site.</p> <p>14 Q Did these meetings take place in person</p> <p>15 or in some other way?</p> <p>16 MR. DISHER: Objection. Form.</p> <p>17 THE WITNESS: NetChoice engaged in phone</p> <p>18 and video conference meetings with its members to</p> <p>19 discuss how HB20 would impact their ability to</p> <p>20 engage in editorial discretion over the content on</p> <p>21 their services.</p> <p>22</p>
<p>1 A To the best of my knowledge, NetChoice</p> <p>2 did not pay any group to oppose HB20.</p> <p>3 Q Did NetChoice pay any groups that were</p> <p>4 already opposing HB20 in order to fund their</p> <p>5 abilities to oppose HB20?</p> <p>6 A To the best of my knowledge, NetChoice</p> <p>7 did not fund or provide support financially to any</p> <p>8 group that was already opposed to HB20 to oppose</p> <p>9 HB20.</p> <p>10 Q The -- well, let me ask this. Any other</p> <p>11 advocacy actions that we haven't already talked</p> <p>12 about that NetChoice took in relation to HB20 as it</p> <p>13 passed through the legislative process?</p> <p>14 MR. DISHER: Objection. Scope.</p> <p>15 THE WITNESS: As I answered previously,</p> <p>16 to the best of my knowledge, I -- I have given you</p> <p>17 all the activities.</p> <p>18 BY MS. CORBELLO:</p> <p>19 Q I apologize if I asked and answered that.</p> <p>20 I couldn't remember.</p> <p>21 You said one of the activities was that</p> <p>22 NetChoice spoke with its members about HB20.</p>	<p>43</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Did NetChoice engage in any form of</p> <p>3 written communication between its members in regards</p> <p>4 to HB20?</p> <p>5 A NetChoice provided members copies of</p> <p>6 written testimony that was given before the Texas</p> <p>7 legislature in opposition to HB20.</p> <p>8 Q Are there any other written</p> <p>9 communications between NetChoice and its members in</p> <p>10 regards to HB20?</p> <p>11 MR. DISHER: Objection. Form.</p> <p>12 THE WITNESS: NetChoice spoke with</p> <p>13 NetChoice members about how HB20 would prevent them</p> <p>14 from engaging in the editorial conduct for their</p> <p>15 sites and services, and some of that communication</p> <p>16 was written.</p> <p>17 BY MS. CORBELLO:</p> <p>18 Q What was the written form of</p> <p>19 communication?</p> <p>20 Was it email or something else?</p> <p>21 A The form of communication was email.</p> <p>22 Q Which members did this email</p>

<p>1 communication take place with between NetChoice and 2 its members?</p> <p>3 MR. DISHER: Objection. Form.</p> <p>4 THE WITNESS: There were many emails that 5 engaged with NetChoice members. NetChoice does its 6 best to speak with all of its members on issues that 7 will impact them directly.</p> <p>8 BY MS. CORBELLO:</p> <p>9 Q The phone and video communication you 10 just mentioned, were any of those communication 11 platforms recorded?</p> <p>12 A Not to my knowledge.</p> <p>13 Q Did NetChoice speak with all of its 14 members in regards to HB20 while it was in the 15 legislative process?</p> <p>16 A NetChoice spoke to many of our members 17 about HB20 and its impact on their ability to engage 18 in editorial discretion with regard to the content 19 on their sites in violation of their First Amendment 20 protections.</p> <p>21 Q Are there any of NetChoice's members that 22 it did not speak to at any time regarding HB20?</p>	<p>46</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Did -- did you or any other agent of 3 NetChoice speak to any Texas legislators about HB20 4 while it was in the legislative process?</p> <p>5 MR. DISHER: Objection. Form.</p> <p>6 Objection. Scope.</p> <p>7 THE WITNESS: NetChoice spoke with Texas 8 legislature -- legislators when it was testifying 9 before the Texas legislature on HB20 in opposition 10 due to its impact on our members and their removal 11 of their ability to engage in editorial discretion 12 given to them under the First Amendment.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Did you or any other agent of NetChoice 15 speak to Texas legislators individually regarding 16 HB20?</p> <p>17 MR. DISHER: Objection. Form.</p> <p>18 Objection. Scope.</p> <p>19 THE WITNESS: NetChoice spoke directly to 20 lawmakers individually as part of their testimony 21 during our opposition to HB20.</p> <p>22</p>
<p>1 A I'm going to review my list of members 2 and let you know.</p> <p>3 Given the ambiguity in the legislation 4 and its impact on many NetChoice members, we made 5 outreaches to, I believe, all NetChoice members as 6 they could be potentially impacted by HB20 due to 7 the vagaries of the statute.</p> <p>8 Q Other than phone, video, email, and I 9 assume spoken communications with its members, did 10 NetChoice communicate with its members in any other 11 way regarding HB20?</p> <p>12 A Not to my knowledge.</p> <p>13 MR. DISHER: Objection to form.</p> <p>14 Go ahead.</p> <p>15 THE WITNESS: Sorry.</p> <p>16 Not to my knowledge.</p> <p>17 BY MS. CORBELLO:</p> <p>18 Q Do you or any other agent of NetChoice 19 text with any of the employees of its members?</p> <p>20 MR. DISHER: Objection. Form.</p> <p>21 THE WITNESS: We do not engage in SMS 22 communication with members.</p>	<p>47</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Other than the testimony you just told me 3 about, did anyone at NetChoice -- you or any other 4 agents of NetChoice speak to any Texas legislators 5 individually about HB20?</p> <p>6 MR. DISHER: Same objections.</p> <p>7 THE WITNESS: As I did not speak to any 8 other Texas legislators about HB20, I cannot 9 100 percent guarantee that a NetChoice agent spoke 10 directly with a Texas lawmaker about HB20.</p> <p>11 BY MS. CORBELLO:</p> <p>12 Q Are you aware even from third-party 13 information of any NetChoice employees who spoke 14 with a Texas legislator regarding HB20?</p> <p>15 MR. DISHER: Same objections.</p> <p>16 THE WITNESS: Any suggestion would be 17 hearsay.</p> <p>18 BY MS. CORBELLO:</p> <p>19 Q That's fine.</p> <p>20 MR. DISHER: Same objections.</p> <p>21 THE WITNESS: I believe NetChoice 22 employees did meet with Texas lawmakers in advance</p>

<p>1 of the passage of HB20 to make them aware of how the 2 law not only violates the First Amendment and 3 impedes the ability of our members to engage in 4 editorial discretion given to them under the 5 First Amendment but also how it would unleash lawful 6 but awful content onto the internet.</p> <p>7 BY MS. CORBELLO:</p> <p>8 Q And what are the names of those 9 lawmakers?</p> <p>10 MR. DISHER: Same objections.</p> <p>11 THE WITNESS: I do not know of any 12 lawmakers except for Senator Bryan Hughes.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Do you know approximately how many 15 lawmakers these employees spoke to?</p> <p>16 A I --</p> <p>17 MR. DISHER: Go ahead.</p> <p>18 THE WITNESS: I do not know of any 19 lawmakers aside from Senator Bryan Hughes.</p> <p>20 BY MS. CORBELLO:</p> <p>21 Q And who are the employees that you either 22 know of or at least heard of that spoke with Texas</p>	<p>50</p> <p>1 mind. Feel free to look it over and just let me 2 know when you're ready.</p> <p>3 You good?</p> <p>4 A I am ready.</p> <p>5 Q I want to point you to the second-to-last 6 sentence of paragraph 3 where it says: "Texans 7 looking for a less moderated experience can use 8 social media platforms like Parler, Gab, or Rumble."</p> <p>9 Do you see that there?</p> <p>10 A Yes, I see that there.</p> <p>11 Q Are you familiar with Parler, just 12 generally, what it is?</p> <p>13 A Yes, I'm familiar with the existence of 14 Parler as a social media platform where people can 15 post content.</p> <p>16 Q Do you know if any of NetChoice's members 17 currently do not allow Parler on their app store for 18 users to download?</p> <p>19 MR. DISHER: Object to form.</p> <p>20 THE WITNESS: To the best of my 21 knowledge, Parler is allowed on the Apple app store, 22 and I do not know if it is allowed on the Google app</p>
<p>1 legislators about HB20?</p> <p>2 MR. DISHER: Objection. Form.</p> <p>3 Objection. Scope.</p> <p>4 THE WITNESS: To the best of my 5 knowledge, the only employee to engage with 6 Senator Bryan Hughes on HB20 is Steve DelBianco.</p> <p>7 BY MS. CORBELLO:</p> <p>8 Q Can you spell that last name for me?</p> <p>9 A D-E-L, capital B-I-A-N-C-O.</p> <p>10 Q Are there any other employees that you 11 know of that either did or may have spoken to Texas 12 legislators about HB20?</p> <p>13 MR. DISHER: Same objections.</p> <p>14 THE WITNESS: To the best of my 15 knowledge, the only NetChoice employee to speak to a 16 Texas legislator is Steve DelBianco.</p> <p>17 BY MS. CORBELLO:</p> <p>18 Q Do you know if these communications 19 between Mr. DelBianco and Senator Bryan Hughes were 20 done over written communication at all?</p> <p>21 A I do not know that.</p> <p>22 Q Let's go to paragraph 3, if you don't</p>	<p>51</p> <p>1 store.</p> <p>2 BY MS. CORBELLO:</p> <p>3 Q Would you be surprised to know that 4 Google is currently blocking Parler from its app 5 store?</p> <p>6 MR. DISHER: Objection. Form.</p> <p>7 THE WITNESS: To the best of my 8 knowledge, Parler is available on the Apple app 9 store.</p> <p>10 BY MS. CORBELLO:</p> <p>11 Q I will represent to you that it is not.</p> <p>12 Are you aware that Google does not allow 13 Parler on its app store?</p> <p>14 MR. DISHER: Objection. Form.</p> <p>15 THE WITNESS: The Android operating 16 system allows users to what is called sideload 17 applications which enables them to add their own 18 applications through services outside of the app 19 store structure.</p> <p>20 BY MS. CORBELLO:</p> <p>21 Q My question's a little different. It's 22 specifically about the app store.</p>

<p>1 Are you aware that Google does not 2 currently allow Parler on its app store? 3 MR. DISHER: Objection. Form. 4 THE WITNESS: If Google does not allow 5 Parler on its app store, it is part of its editorial 6 discretion to make sure that the apps on its app 7 store conform to its viewpoint. 8 BY MS. CORBELLO: 9 Q So you said "if." 10 Does that mean, yes, you are aware of it, 11 or am I the first one telling you this? 12 MR. DISHER: Objection. Form. 13 THE WITNESS: I was unaware that Parler 14 was unavailable on the Google app store. 15 BY MS. CORBELLO: 16 Q Same question looking for the same sort 17 of answer. 18 Are you aware that Amazon currently does 19 not allow Parler on its app store? 20 MR. DISHER: Objection. Form. 21 THE WITNESS: I was unaware that Amazon 22 allows [sic] Parler on its app store.</p>	<p>54</p> <p>1 MR. DISHER: Objection. Form. 2 THE WITNESS: They do not need to be the 3 primary function to be a social media platform. 4 BY MS. CORBELLO: 5 Q Okay. So based on the definition you 6 just gave me for "social media platform," do you 7 understand Gab to be a social media platform? 8 A Yes. 9 Q Are you aware that Gab is currently 10 blocked from being present on the Google app store? 11 MR. DISHER: Objection. Form. 12 THE WITNESS: Gab is blocked on the 13 Google app store as part of Google's efforts to 14 engage in its editorial discretion to maintain an 15 app store that conforms to its viewpoint under the 16 First Amendment protections. 17 BY MS. CORBELLO: 18 Q So is it NetChoice's position that there 19 is nothing wrong with Google lessening the 20 accessibility of Gab or Parler to users? 21 MR. DISHER: Objection. Form. 22 Objection. Scope.</p>
<p>1 BY MS. CORBELLO: 2 Q The next one you mentioned, Gab. Are you 3 generally aware of what Gab is? 4 A Gab, like Parler, is accessible on every 5 Web browser where users can go, post comments, and 6 review comments. 7 Q So is Gab a social media platform? 8 MR. DISHER: Objection. Form. 9 THE WITNESS: What's your differentiation 10 of "social media platform"?</p> <p>11 BY MS. CORBELLO: 12 Q Well, I guess I'm -- it says here in your 13 declaration "can use social media platforms like 14 Parler, Gab, or Rumble." 15 So what's your definition of "social 16 media platform"?</p> <p>17 A My definition of "social media platform" 18 is a place where people can post comments and review 19 comments in an online space.</p> <p>20 Q And do those two functions you just 21 described have to be the primary function of the 22 platform in order to be a social media platform?</p>	<p>55</p> <p>1 THE WITNESS: NetChoice's view is that 2 private businesses can decide what is best for their 3 users and their advertisers.</p> <p>4 BY MS. CORBELLO: 5 Q Do you know how many users Google has? 6 A I do not know exactly how many users 7 Google has. 8 Q Do you know an approximate number of 9 users that Google has? 10 MR. DISHER: Objection. Form. 11 THE WITNESS: I know that they have more 12 than 50 million.</p> <p>13 BY MS. CORBELLO: 14 Q So if Google, as I represent to you, is 15 blocking Gab from its platforms, is it fair to say 16 that the 50 million users that use Gab -- or that 17 use Google are not being exposed to Gab on that 18 platform? 19 MR. DISHER: Objection. Form. 20 THE WITNESS: No, that is not a fair 21 statement.</p> <p>22</p>

<p>1 BY MS. CORBELLO:</p> <p>2 Q Why not?</p> <p>3 MR. DISHER: Same objection.</p> <p>4 THE WITNESS: The platform is the Android device. The platform is connected devices. And with that, not only Android devices, but Android tablets, Chrome-based PCs all have the capability of accessing the Websites run by Gab.</p> <p>5 BY MS. CORBELLO:</p> <p>6 Q Fair enough. Let me limit it down a little bit.</p> <p>7 Is it fair to say that Google's 50 million users, if, as I represent to you, Gab is not allowed on the app store, is it fair to say that those users do not have access to Gab as a downloadable app on the app store?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: As part of its editorial discretion, Google has chosen to not allow Gab for download as part of its right as a private business to engage in editorial and viewpoint expression under its rights from the First Amendment of the</p>	<p>58</p> <p>1 store?</p> <p>2 MR. DISHER: Objection. Form.</p> <p>3 THE WITNESS: It is accurate to say that Google users -- actually, let me rephrase.</p> <p>4 It's accurate to say that the Gab app is not accessible on the Android app store.</p> <p>5 BY MS. CORBELLO:</p> <p>6 Q Are you aware that Apple currently blocks Gab from being a downloadable app on its app store?</p> <p>7 MR. DISHER: Objection. Form.</p> <p>8 THE WITNESS: Yes, I am aware that Apple blocks Gab's app from being downloadable from the Apple app store.</p> <p>9 BY MS. CORBELLO:</p> <p>10 Q And it's NetChoice's position that Apple is allowed to deny access to its users to Gab as an app in its app store?</p> <p>11 MR. DISHER: Objection. Form.</p> <p>12 THE WITNESS: Apple is not a member of NetChoice.</p> <p>13</p>
<p>1 U.S. Constitution.</p> <p>2 MS. CORBELLO: I'm going to object as non-responsive.</p> <p>3 BY MS. CORBELLO:</p> <p>4 Q I want to be clear. My question is not why Google has denied access to Gab. My question is whether its 50 million users can access Gab on Google's platform currently.</p> <p>5 MR. DISHER: Objection. Form.</p> <p>6 THE WITNESS: As I answered previously, the Google platform is robust. There are many Google devices including --</p> <p>7 BY MS. CORBELLO:</p> <p>8 Q I apologize.</p> <p>9 Did I say "platform"?</p> <p>10 A Yes.</p> <p>11 Q I apologize. I meant app store.</p> <p>12 MS. CORBELLO: Oh, God, I really don't want to ask this a third time.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Is it true that Google's 50 million users currently cannot access the Gab app on Google's app</p>	<p>59</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Well, we'll strike that, then.</p> <p>3 Let's go to paragraph 4.</p> <p>4 If you need some time to look it over, let me know.</p> <p>5 MR. DISHER: Is this a good stop -- good point for our first break?</p> <p>6 MS. CORBELLO: Yeah. Sure.</p> <p>7 THE VIDEOGRAPHER: We are going off the record.</p> <p>8 This is the end of media unit number 1.</p> <p>9 The time is 4:17 p.m.</p> <p>10 (A recess was taken.)</p> <p>11 THE VIDEOGRAPHER: We are back on the record.</p> <p>12 This is the beginning of media unit number 2.</p> <p>13 The time is 4:30 p.m.</p> <p>14 BY MS. CORBELLO:</p> <p>15 Q So we were talking about paragraph 4.</p> <p>16 Paragraph 4 contains a list of NetChoice's members; right?</p> <p>17</p>

<p>1 A That is correct.</p> <p>2 Q Is this list in paragraph 4 current, or</p> <p>3 have any members been added or removed from this</p> <p>4 list?</p> <p>5 A To the best of my knowledge, this list is</p> <p>6 accurate.</p> <p>7 Q So when we were talking earlier about</p> <p>8 conversations with members regarding HB20, are these</p> <p>9 the members, this list here, who you were talking</p> <p>10 about?</p> <p>11 A When I use the term "NetChoice members,"</p> <p>12 I am referring to the members in this list.</p> <p>13 Q When those conversations with these</p> <p>14 members took place about HB20, did any of these</p> <p>15 members express opposition to bringing this lawsuit</p> <p>16 that we're all here for?</p> <p>17 A To the best of my knowledge, every member</p> <p>18 with whom we spoke to about HB20 raised concerns</p> <p>19 about how this law going into effect would impact</p> <p>20 their ability to engage an editorial discretion.</p> <p>21 Q Did any of these members ask NetChoice</p> <p>22 not to bring this lawsuit on their behalf?</p>	<p>62</p> <p>1 that at least YouTube, which is a subsidiary of</p> <p>2 Google, Facebook, and Twitter would be covered by</p> <p>3 HB20.</p> <p>4 Q A little while ago, you gave me your own</p> <p>5 definition of social media platform.</p> <p>6 Do you remember that?</p> <p>7 A I do remember giving you a definition of</p> <p>8 social media platform.</p> <p>9 Q Putting HB20 and its definition of social</p> <p>10 media platform aside for a second, which of these</p> <p>11 members listed in paragraph 4 do you believe fall</p> <p>12 under your definition of social media platform as</p> <p>13 you discussed it with me earlier?</p> <p>14 MR. DISHER: Objection. Form.</p> <p>15 Go ahead.</p> <p>16 THE WITNESS: Airbnb, Alibaba, Amazon,</p> <p>17 AOL, DJI, DRN, eBay, Etsy, Expedia, Fluid Truck,</p> <p>18 Google, HomeAway, Lime, Nextdoor, Lyft, Oath,</p> <p>19 OfferUp, PayPal, Pinterest, StubHub, TikTok,</p> <p>20 TravelTech, Turo, Twitter, Verisign, Vrbo, Waymo,</p> <p>21 and Yahoo would all be covered under my definition</p> <p>22 of social media platform.</p>
<p>1 MR. DISHER: Objection. Form.</p> <p>2 THE WITNESS: I believe answering the</p> <p>3 question would violate my NDA with these businesses.</p> <p>4 BY MS. CORBELLO:</p> <p>5 Q This list here in paragraph 4, which of</p> <p>6 these members does NetChoice contend will be</p> <p>7 affected by HB20?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 MS. CORBELLO: What's the basis of that</p> <p>10 objection, Todd?</p> <p>11 MR. DISHER: Calls for a legal</p> <p>12 conclusion.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Go ahead and answer.</p> <p>15 A Due to the vagaries of the definition of</p> <p>16 "social media" in HB20, many of the members listed</p> <p>17 here may or may not be covered.</p> <p>18 Likewise, because they must have</p> <p>19 50 million monthly active users, I cannot for</p> <p>20 certain tell you which of these members is or is not</p> <p>21 covered by HB20.</p> <p>22 Having said that, I can say certainly</p>	<p>63</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Did you mean to not mention Facebook in</p> <p>3 that list?</p> <p>4 A I did not -- I intended to mention</p> <p>5 Facebook in that list.</p> <p>6 Q I might have just missed it, but I just</p> <p>7 wanted to clarify.</p> <p>8 Facebook is a part of the list you just</p> <p>9 gave; right?</p> <p>10 A That is correct.</p> <p>11 MR. DISHER: And to clarify, you said</p> <p>12 "DJI"?</p> <p>13 THE WITNESS: Yes.</p> <p>14 MR. DISHER: And this says "DII."</p> <p>15 THE WITNESS: That is a typo.</p> <p>16 MR. DISHER: Okay.</p> <p>17 BY MS. CORBELLO:</p> <p>18 Q Oh, okay.</p> <p>19 MR. DISHER: Thank you.</p> <p>20 BY MS. CORBELLO:</p> <p>21 Q So the DII that comes after AOL in</p> <p>22 paragraph 4 is meant to say DJ, as in James, I?</p>

<p>1 A Correct.</p> <p>2 Q I still don't know what it's --</p> <p>3 Do all of these members moderate their</p> <p>4 user-generated content in the same way?</p> <p>5 MR. DISHER: Objection. Form.</p> <p>6 THE WITNESS: These members engage in</p> <p>7 content moderation and their editorial discretion in</p> <p>8 the way that they see is best for promoting their</p> <p>9 viewpoints and the interests of their users and</p> <p>10 their advertisers.</p> <p>11 BY MS. CORBELLO:</p> <p>12 Q So is your answer, no, the members do not</p> <p>13 moderate content in the exact same way?</p> <p>14 A Members engage in their content</p> <p>15 moderation in ways that they think is best for their</p> <p>16 users, their advertisers, and promoting their</p> <p>17 viewpoints. Sometimes that content moderation will</p> <p>18 be similar; sometimes that content moderation will</p> <p>19 be different. Sometimes the methods of enforcement</p> <p>20 are similar; sometimes the methods of enforcement</p> <p>21 are different.</p> <p>22</p>	<p>66</p> <p>1 different enforcement mechanisms.</p> <p>2 Q So is the answer to my question, no, all</p> <p>3 of the members listed in paragraph 4 do not have the</p> <p>4 exact same content moderation policies?</p> <p>5 A To the best of my knowledge, the members</p> <p>6 listed in paragraph 4 engage in the content</p> <p>7 moderation they think is best for their users that</p> <p>8 express their viewpoints. And they maybe and</p> <p>9 sometimes are different.</p> <p>10 Q Do all of your members listed here in</p> <p>11 paragraph 4 use AI in any way -- we don't need to</p> <p>12 get into specifics -- but in any way to moderate</p> <p>13 content on their platforms?</p> <p>14 A Can you explain what do you mean by "AI"?</p> <p>15 Q Sure.</p> <p>16 Do any of these members have algorithms</p> <p>17 that interact with user-generated content once that</p> <p>18 content is generated in order to moderate the</p> <p>19 content for its platform?</p> <p>20 MR. DISHER: Objection. Form.</p> <p>21 THE WITNESS: Many of the members of</p> <p>22 NetChoice use algorithms written by their employees</p>	68
<p>1 BY MS. CORBELLO:</p> <p>2 Q Do you understand which members are</p> <p>3 different from one another versus which members are</p> <p>4 similar?</p> <p>5 MR. DISHER: Objection. Form.</p> <p>6 THE WITNESS: You are speaking with</p> <p>7 regard to their engagement and content moderation?</p> <p>8 BY MS. CORBELLO:</p> <p>9 Q Yes.</p> <p>10 A I am familiar with ways in which members</p> <p>11 are similar with regard to their content moderation</p> <p>12 and ways in which they are different with regard to</p> <p>13 their content moderation both in what they engage in</p> <p>14 content moderation as well as the manner in which</p> <p>15 they engage in content moderation.</p> <p>16 Q Do all of these members listed in</p> <p>17 paragraph 4 have the same policies regarding content</p> <p>18 moderation?</p> <p>19 A Members listed in paragraph 4 may have</p> <p>20 similar or same content moderation policies and</p> <p>21 enforcement mechanisms, and they may have similar --</p> <p>22 or different content moderation policies and</p>	<p>67</p> <p>1 and sometimes people they hire to enforce and engage</p> <p>2 in the content moderation decisions that are made in</p> <p>3 an effort to promote their editorial discretion and</p> <p>4 their viewpoints.</p> <p>5 BY MS. CORBELLO:</p> <p>6 Q Do any of the members exclusively use</p> <p>7 humans to review user-generated content?</p> <p>8 A I do not know.</p> <p>9 Q Do any of these members exclusively use</p> <p>10 AI or algorithms in order to review user-generated</p> <p>11 content?</p> <p>12 A I do not know.</p> <p>13 Q Have any of these members shared the</p> <p>14 substance of the algorithms we've been talking about</p> <p>15 with NetChoice?</p> <p>16 MR. DISHER: Objection. Form.</p> <p>17 THE WITNESS: NetChoice members have</p> <p>18 shared with us the content moderation guidelines,</p> <p>19 the editorial discretion, and the viewpoints that</p> <p>20 they use in the creation and development of the</p> <p>21 algorithms.</p> <p>22</p>	69

<p>1 MS. CORBELLO: Objection.</p> <p>2 Non-responsive.</p> <p>3 BY MS. CORBELLO:</p> <p>4 Q My question is a little bit more specific</p> <p>5 than just overall views.</p> <p>6 The algorithms themselves that address</p> <p>7 and interact with user-generated content, have those</p> <p>8 algorithms been shared by any of NetChoice's members</p> <p>9 with NetChoice?</p> <p>10 A If such information were shared with</p> <p>11 NetChoice, they would be subject to our NDA.</p> <p>12 Q Have any of the members' source codes</p> <p>13 related to content moderation been shared with</p> <p>14 NetChoice?</p> <p>15 MR. DISHER: Objection. Form.</p> <p>16 THE WITNESS: Think about the question.</p> <p>17 Can you repeat which source code you are</p> <p>18 describing, please?</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q When I say "source code," I mean the</p> <p>21 source codes that are used in order to provide data</p> <p>22 to algorithms in order to inform them or update them</p>	<p>70</p> <p>1 mean any data sets created by a programmer or an AI</p> <p>2 that then interacts with the algorithm in order to</p> <p>3 train it to either better recognize content it's</p> <p>4 supposed to moderate, differently recognize content</p> <p>5 it's supposed to moderate. Any training data sets</p> <p>6 that are used to train the algorithms and the</p> <p>7 content that they're -- it's moderating.</p> <p>8 A Any such disclosure will be subject to</p> <p>9 our NDA.</p> <p>10 Q Have any of NetChoice's members shared</p> <p>11 documentation with NetChoice related to content</p> <p>12 moderation?</p> <p>13 MR. DISHER: Objection. Form.</p> <p>14 THE WITNESS: NetChoice members have</p> <p>15 shared with NetChoice their community guidelines and</p> <p>16 their content moderation standards which are part of</p> <p>17 the terms of service and underlying agreements that</p> <p>18 users enter into when they sign up for the service.</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q Maybe this will clarify my question a</p> <p>21 little bit. I'm sorry if it was vague.</p> <p>22 Have any of NetChoice's members shared</p>
<p>1 on the type of content that these members are trying</p> <p>2 to moderate in order to comply with their policies.</p> <p>3 So when I say "source codes," those are the ones I'm</p> <p>4 talking about.</p> <p>5 Does that make it more clear?</p> <p>6 MR. DISHER: Objection. Form.</p> <p>7 Go ahead.</p> <p>8 THE WITNESS: They have not provided</p> <p>9 source code to NetChoice.</p> <p>10 BY MS. CORBELLO:</p> <p>11 Q Have any of NetChoice's members provided</p> <p>12 their training data sets related to content</p> <p>13 moderation with NetChoice?</p> <p>14 MR. DISHER: Objection. Form.</p> <p>15 THE WITNESS: Can you be more specific on</p> <p>16 training data sets?</p> <p>17 Who is the audience for which training</p> <p>18 data set?</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q The -- well, the audience, I guess, for</p> <p>21 lack of a better word, would be the algorithms.</p> <p>22 So when I say "training data sets," I</p>	<p>71</p> <p>1 its Wiki, Readme, or other similar documentation</p> <p>2 related to software utilized for content moderation</p> <p>3 with NetChoice?</p> <p>4 A No.</p> <p>5 Q Have any of NetChoice's members shared</p> <p>6 their workflow diagrams related to content</p> <p>7 moderation with NetChoice?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: NetChoice members have not</p> <p>10 shared with us their internal workflow on</p> <p>11 programming for content moderation.</p> <p>12 BY MS. CORBELLO:</p> <p>13 Q Have NetChoice's members shared any</p> <p>14 external workflow diagrams related to content</p> <p>15 moderation with NetChoice?</p> <p>16 A NetChoice members have met with us -- or</p> <p>17 met with NetChoice several times to discuss how</p> <p>18 content moderation policies operate within their</p> <p>19 services.</p> <p>20 Q Go to paragraph 5 for me. It's on</p> <p>21 pages 3 and 4.</p> <p>22 Let me know when you're ready to talk</p>

<p>1 about it.</p> <p>2 A Okay.</p> <p>3 Q I want to point you to -- it's on page 4,</p> <p>4 still on paragraph 5, subsection i there where you</p> <p>5 talk about --</p> <p>6 MR. DISHER: Page 3 of the document.</p> <p>7 THE WITNESS: Thank you.</p> <p>8 MR. DISHER: Page 4 is at the top here.</p> <p>9 THE WITNESS: Thank you.</p> <p>10 MR. DISHER: UCF pagination.</p> <p>11 MS. CORBELLO: Yeah. Sorry. I was</p> <p>12 trying to be helpful, but --</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Still on paragraph 5, subsection i where</p> <p>15 you mention NetChoice members "are open to the</p> <p>16 public, subject to their representative terms and</p> <p>17 conditions and community guidelines."</p> <p>18 Do you see that?</p> <p>19 A Yes, I see that.</p> <p>20 Q When you say they "are open to the</p> <p>21 public," what did you mean by that?</p> <p>22 A It means that they are accessible on</p>	<p>74</p> <p>1 different.</p> <p>2 Are you personally aware of each member's</p> <p>3 process for allowing a member of the public to</p> <p>4 become a user on its platform, or are there any</p> <p>5 members in that list that, sitting here today, you</p> <p>6 don't have knowledge of how that works?</p> <p>7 A I have knowledge for all NetChoice</p> <p>8 members of how members of the public can gain access</p> <p>9 to the underlying service.</p> <p>10 Q So let's use Facebook as an example.</p> <p>11 How does one become a user on Facebook?</p> <p>12 A Facebook users or potential Facebook</p> <p>13 users can visit Facebook through a myriad of sources</p> <p>14 whether through an application, visiting the</p> <p>15 website. On both they are presented with a terms of</p> <p>16 service or terms of use and a privacy policy. In</p> <p>17 order to access certain parts of that site and</p> <p>18 service, they must also expressly agree -- sorry.</p> <p>19 Let me rephrase that.</p> <p>20 By visiting that site, they agree to the</p> <p>21 terms of service which also include agreement to the</p> <p>22 community guidelines. These terms of service and</p>
<p>1 websites and other devices and that some people may</p> <p>2 be able to sign up for their services subject to</p> <p>3 agreeing to the community guidelines which are the</p> <p>4 viewpoints and editorial discretion of those sites</p> <p>5 and services.</p> <p>6 Q Do you have personal knowledge of how</p> <p>7 each one of NetChoice's members permit the public to</p> <p>8 become users on their platforms?</p> <p>9 MR. DISHER: Objection. Form.</p> <p>10 THE WITNESS: I am -- I have personal</p> <p>11 knowledge of several NetChoice members on how they</p> <p>12 allow users to access their platforms.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q I really don't want to ask you about all</p> <p>15 if you don't have the knowledge.</p> <p>16 Are there any members that you do not</p> <p>17 know how members of the public are able to access</p> <p>18 your members' platforms?</p> <p>19 A Virtually every single NetChoice member</p> <p>20 has a terms of service to which all users agree when</p> <p>21 they access the platform.</p> <p>22 Q I understand. My question's a little</p>	<p>75</p> <p>1 its subsidiary, the community guidelines, allow</p> <p>2 these platforms to engage in editorial discretion,</p> <p>3 in the case of Facebook, as well as promoting the</p> <p>4 viewpoints that are best for its users and its</p> <p>5 advertisers. This is a contract that users enter</p> <p>6 into with Facebook when they visit the website.</p> <p>7 Q What personal information does a member</p> <p>8 of the public have to provide Facebook when signing</p> <p>9 up for an account with Facebook?</p> <p>10 A Can you give me a definition of "personal</p> <p>11 information"?</p> <p>12 Q Well, we can go one by one.</p> <p>13 Does a member of the public have to</p> <p>14 provide their first and last name to Facebook as</p> <p>15 part of the process to sign up as a user?</p> <p>16 A Members of the public are required to</p> <p>17 provide their real name as part of the terms of</p> <p>18 service. Failure to do so is a violation of the</p> <p>19 contract with Facebook.</p> <p>20 Q Are users required to provide their</p> <p>21 birthdate as part of the process in signing up to be</p> <p>22 a user on Facebook?</p>

<p>1 A No, users are not required to provide 2 their birth date to become a user on Facebook. 3 Q Other than providing their first and last 4 name and agreeing to the terms of service, what else 5 do users have to do, if anything, to become a user 6 on Facebook?</p> <p>7 A Because it's changing regularly, to the 8 best of my knowledge, it can be either an email 9 address or possibly a phone number coupled with a 10 user-created password.</p> <p>11 Q Any other information you can think of 12 that someone has to provide before becoming a 13 Facebook user?</p> <p>14 A Not to my knowledge.</p> <p>15 Q Once the information we just talked about 16 is provided and the terms of service are agreed to, 17 does a member of the public gain immediate access to 18 Facebook's platform?</p> <p>19 A Define "Facebook's platform" for me, 20 please, because they have many different businesses.</p> <p>21 Q Well, I guess the way I'm using it is in 22 its social media function.</p>	<p>78</p> <p>1 BY MS. CORBELLO: 2 Q Well, the content moderation policies 3 that Facebook has, you're aware of what those are; 4 right? 5 A Yes. 6 Q Those policies, are they applied to every 7 piece of user-generated content that comes to the 8 site regardless of who the user is that is 9 generating that content?</p> <p>10 MR. DISHER: Object to form.</p> <p>11 THE WITNESS: Facebook will use its 12 editorial discretion as well as its viewpoint to 13 decide what content is appropriate for its users, 14 its advertisers.</p> <p>15 BY MS. CORBELLO: 16 Q My question's a little different. 17 When user-generated content comes to 18 Facebook -- I'm sure "comes to" is not the right 19 technical term. But when user-generated content is 20 generated, does Facebook apply its terms of service 21 and its community standards equally to that 22 user-generated content regardless of which user</p>
<p>1 Did that clarify it?</p> <p>2 A Users, once they have been authorized by 3 Facebook to access the site, may gain access to the 4 site subject to compliance with their agreement 5 which includes the terms of service and community 6 guidelines.</p> <p>7 Q So what I'm hearing is is that once the 8 users gain access to the site after creating a user 9 account, they are, then, subject to the terms and 10 conditions and the content policies that Facebook 11 has in place; is that right?</p> <p>12 A Users are subject to the terms of service 13 and privacy policies when they visit a Facebook 14 website. Those terms of service include, as a 15 subsidiary, the community guidelines.</p> <p>16 Q Do you know whether those terms of 17 service and community guidelines are applied equally 18 across all users of Facebook?</p> <p>19 MR. DISHER: Objection. Form.</p> <p>20 THE WITNESS: Can you explain to me 21 "equally," please.</p> <p>22</p>	<p>79</p> <p>1 generated that content?</p> <p>2 A Facebook applies its community guidelines 3 in the ways that it best believes will promote its 4 viewpoint and its editorial content and -- or its 5 editorial discretion.</p> <p>6 In doing so, it may promote some 7 viewpoints and demote others as part of its 8 editorial discretion as guaranteed under the 9 First Amendment.</p> <p>10 Q So does Facebook do that promotion or 11 de-prioritization based on the user that created the 12 content, or is it based on the content itself?</p> <p>13 A Facebook will remove content that 14 violates their community guidelines and community 15 standards. It will also select and promote content 16 that they think is best for that particular user or 17 most useful to that particular user.</p> <p>18 Q Mr. Szabo, I desperately do not want to 19 ask the Court for more time and actually want to do 20 less than the four hours we've been granted. So I 21 very much ask you to focus on the question I'm 22 asking and answer it.</p>

<p>1 My question is -- it goes to how Facebook 2 is treating its content.</p> <p>3 Is it moderating its content pursuant to 4 its content moderation policies because of the users 5 that are generating that content, or is it 6 moderating that content based on its community 7 guidelines based on the content itself?</p> <p>8 Does that make sense?</p> <p>9 MR. DISHER: Objection. Form.</p> <p>10 THE WITNESS: Facebook will engage in 11 content moderation based on the content of the 12 publication and if it violates the community 13 standards or community guidelines. It will also 14 engage in content moderation when it sees users 15 violating that type of community guidelines.</p> <p>16 So when users are known to abuse 17 community guidelines, Facebook may choose to not 18 publish their content.</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q And those users who abuse the guidelines, 21 are they treated in the same way regardless of who 22 that user is --</p>	<p>82</p> <p>1 MR. DISHER: Objection. Form.</p> <p>2 THE WITNESS: Facebook's community 3 guidelines, if they are applied differently to 4 different users, is part of the editorial discretion 5 and viewpoint of Facebook in its decision for what 6 is best for its users, its advertisers, and the 7 advancement of Facebook's viewpoint.</p> <p>8 BY MS. CORBELLO:</p> <p>9 Q So you used the word "if."</p> <p>10 Is your -- just to clarify: Is your 11 testimony that Facebook might be discriminating 12 against its users in applying its community 13 guidelines differently, or you have personal 14 knowledge that that is what they are currently 15 doing?</p> <p>16 MR. DISHER: Objection. Form.</p> <p>17 THE WITNESS: I do not have firsthand 18 knowledge of any discriminatory application of 19 Facebook's community guidelines against any user.</p> <p>20 BY MS. CORBELLO:</p> <p>21 Q Does Facebook share its algorithms with 22 NetChoice, the algorithms that are applied to users</p>
<p>1 MR. DISHER: Objection. Form.</p> <p>2 BY MS. CORBELLO:</p> <p>3 Q -- by Facebook?</p> <p>4 MR. DISHER: Objection. Form.</p> <p>5 THE WITNESS: Facebook will treat users 6 in foreign nations differently than they treat users 7 in the United States of America.</p> <p>8 BY MS. CORBELLO:</p> <p>9 Q Thanks for that clarification.</p> <p>10 So to be more specific, in the 11 United States, will Facebook treat its users 12 differently based on who that user is when they're 13 violating Facebook's policies?</p> <p>14 A Due to its goal of promoting its 15 editorial discretion and viewpoints, Facebook will 16 sometimes treat an individual differently than a 17 different user based on, for example, their status 18 as a politician due to Facebook's editorial and 19 viewpoint intent to promote political discussion.</p> <p>20 Q So Facebook's terms and conditions and 21 community guidelines get applied differently to 22 users based on who those users are?</p>	<p>83</p> <p>85</p> <p>1 as they are creating Facebook accounts?</p> <p>2 MR. DISHER: Objection. Form.</p> <p>3 THE WITNESS: Sorry. You lost me halfway 4 through that question.</p> <p>5 BY MS. CORBELLO:</p> <p>6 Q Sure. Maybe I'll back up a little bit.</p> <p>7 Do you know if Facebook applies any sort 8 of algorithms or human review to a user account 9 once -- or immediately after a user has created that 10 account --</p> <p>11 MR. DISHER: Objection. Form.</p> <p>12 BY MS. CORBELLO:</p> <p>13 Q -- in order to verify the legitimacy of 14 the account -- the account or the illegitimacy of 15 the account?</p> <p>16 MR. DISHER: Same objection.</p> <p>17 THE WITNESS: Facebook will analyze the 18 legitimacy of a user creation to ensure and stop 19 things like fraud, attempts to engage in criminal 20 activity, and requests coming from known IP 21 addresses of criminals.</p> <p>22</p>

<p>1 BY MS. CORBELLO:</p> <p>2 Q And does Facebook do that solely through</p> <p>3 human review?</p> <p>4 MR. DISHER: Objection. Form.</p> <p>5 THE WITNESS: Facebook uses a mixture of</p> <p>6 algorithmic activity written by Facebook employees</p> <p>7 and Facebook contractors to advance the community</p> <p>8 guidelines and viewpoints of Facebook as well as</p> <p>9 human review.</p> <p>10 BY MS. CORBELLO:</p> <p>11 Q And so -- sorry. Just to clarify. You</p> <p>12 said "to advance the community guidelines."</p> <p>13 Are you talking specifically about this</p> <p>14 topic, users gaining entry to Facebook and screening</p> <p>15 those users, are algorithms used for that purpose?</p> <p>16 A Algorithms are used alongside,</p> <p>17 potentially, human review when a user attempts to</p> <p>18 create a new account on Facebook to stop known bad</p> <p>19 actors and prevent spammers as well as fraudulent</p> <p>20 accounts.</p> <p>21 Q So now that we've kind of specified what</p> <p>22 algorithms we're talking about, those algorithms --</p>	<p>86</p> <p>1 That also continued at my work at the</p> <p>2 Electronic Software Association engaging in IP</p> <p>3 violations on social media platforms as well as my</p> <p>4 work at the Motion Picture Association in pursuing</p> <p>5 viol- -- IP violations of online platforms.</p> <p>6 It continued with my work as an attorney</p> <p>7 in private practice creating terms of service,</p> <p>8 privacy policy, interpreting community guidelines on</p> <p>9 services that include Facebook for clients, as well</p> <p>10 as more than a decade working at NetChoice and</p> <p>11 engaging, on a weekly basis, with most all NetChoice</p> <p>12 members to better understand how their specific</p> <p>13 systems work, how their programs are effectuated,</p> <p>14 and how they make the decisions that they do.</p> <p>15 This also includes analysis of their</p> <p>16 business models with regard to advertising and the</p> <p>17 impact that their editorial discretion and</p> <p>18 viewpoints have on their business.</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q Can I -- can I ask: So for the current</p> <p>21 business models -- I assume you're intimately</p> <p>22 familiar with the current business models of your</p>
<p>1 has Facebook shared those algorithms with NetChoice?</p> <p>2 A Facebook has not shared those algorithms</p> <p>3 with NetChoice.</p> <p>4 Q Go to paragraph 6 for me, and let me know</p> <p>5 when you're ready to talk about it.</p> <p>6 A Okay.</p> <p>7 Q So pointing to the second half of that</p> <p>8 first sentence in paragraph 6, it says: "So we are</p> <p>9 intimately familiar with the business models our</p> <p>10 members use and rely on to provide services to users</p> <p>11 and advertisers alike."</p> <p>12 Do you see that?</p> <p>13 A Yes, I see that.</p> <p>14 Q Okay. This intimate familiarity you have</p> <p>15 with your members' business models, can you describe</p> <p>16 to me how that familiarity came about?</p> <p>17 MR. DISHER: Objection. Form.</p> <p>18 THE WITNESS: That familiarity was</p> <p>19 developed over decades of work in the internet</p> <p>20 ecosystem starting with my initial efforts as a</p> <p>21 computer science major at Rice University. Prior to</p> <p>22 that, I was a website programmer for NASA.</p>	<p>87</p> <p>1 members? Yes?</p> <p>2 A I'm intimately familiar with the business</p> <p>3 models of my members.</p> <p>4 Q As they currently stand?</p> <p>5 A Cor- -- as of the time of this</p> <p>6 declaration, yes.</p> <p>7 Q And as to these current business models</p> <p>8 of NetChoice's members, how are those current</p> <p>9 business models communicated to NetChoice?</p> <p>10 Is it -- are there meetings involved? Is</p> <p>11 it a written communication? Do they provide</p> <p>12 their -- some sort of report to NetChoice?</p> <p>13 MR. DISHER: Objection. Form.</p> <p>14 THE WITNESS: Before joining NetChoice,</p> <p>15 we speak with our members about what issues impact</p> <p>16 their business directly. As they continue their</p> <p>17 journey as NetChoice members, we continue to update</p> <p>18 ourselves on how changes in their business models</p> <p>19 are impacted by changes in the policy and legal</p> <p>20 landscape, and we are regularly informed by members</p> <p>21 of changes in their business model.</p> <p>22</p>

<p>1 BY MS. CORBELLO:</p> <p>2 Q Are NetChoice's members required to</p> <p>3 inform of any updates to their business models?</p> <p>4 A NetChoice does not require members to</p> <p>5 provide updates, but members do because that is part</p> <p>6 of the benefit of being part of a trade association.</p> <p>7 Q Does NetChoice do any sort of independent</p> <p>8 investigation of what the members tell it insomuch</p> <p>9 as how their business models work?</p> <p>10 MR. DISHER: Objection. Form.</p> <p>11 THE WITNESS: NetChoice regularly reviews</p> <p>12 and studies changes in business practices of its</p> <p>13 members including reviewing things like transparency</p> <p>14 reports or community standards and community</p> <p>15 guidelines at length.</p> <p>16 BY MS. CORBELLO:</p> <p>17 Q So the two examples you just gave me,</p> <p>18 unless I'm mistaken, those are both documents or</p> <p>19 information that are created by the members</p> <p>20 themselves; right?</p> <p>21 MR. DISHER: Objection. Form.</p> <p>22 THE WITNESS: The community standards for</p>	<p>90</p> <p>1 A NetChoice regularly reviews, on its own,</p> <p>2 changes by members to their business model as well</p> <p>3 as changes to the business landscape.</p> <p>4 BY MS. CORBELLO:</p> <p>5 Q How are those changes communicated to</p> <p>6 NetChoice?</p> <p>7 MR. DISHER: Objection. Form.</p> <p>8 THE WITNESS: NetChoice members will</p> <p>9 contact NetChoice to inform us of changes in their</p> <p>10 business models.</p> <p>11 BY MS. CORBELLO:</p> <p>12 Q Okay. I'm going to try this question</p> <p>13 again. I think I've made it clear, but I'll try one</p> <p>14 more time -- or maybe several other times.</p> <p>15 Aside from any data or information that</p> <p>16 NetChoice's members create and provide -- either</p> <p>17 provide to NetChoice or they simply create and</p> <p>18 NetChoice investigates it themselves, other than</p> <p>19 member-created information, does NetChoice do any</p> <p>20 investigation outside of that in order to determine</p> <p>21 what the business models of these members is?</p> <p>22 MR. DISHER: Objection. Form.</p>	<p>92</p>
<p>1 each member that NetChoice reviews are the community</p> <p>2 standards created by that business as part of their</p> <p>3 editorial and viewpoint discretion.</p> <p>4 BY MS. CORBELLO:</p> <p>5 Q And the transparency reports you</p> <p>6 mentioned, are those the transparency reports that</p> <p>7 the members themselves create?</p> <p>8 A The transparency reports are created by</p> <p>9 several NetChoice members.</p> <p>10 Q So other than information created by the</p> <p>11 members -- or communicated by the members to</p> <p>12 NetChoice, does NetChoice do any independent</p> <p>13 investigation of the way in which the members'</p> <p>14 business models work?</p> <p>15 MR. DISHER: Objection. Form.</p> <p>16 THE WITNESS: NetChoice regularly reviews</p> <p>17 and extrapolates changes in our members' business</p> <p>18 models as well as using our extensive knowledge to</p> <p>19 identify how business models may change in the</p> <p>20 future.</p> <p>21 BY MS. CORBELLO:</p> <p>22 Q So is the answer to my question "yes"?</p>	<p>91</p> <p>1 Go ahead.</p> <p>2 THE WITNESS: NetChoice regularly reviews</p> <p>3 writings by third parties on activities and business</p> <p>4 models of NetChoice members.</p> <p>5 BY MS. CORBELLO:</p> <p>6 Q When you say "writings," what do you mean</p> <p>7 by that?</p> <p>8 A These writings can take the form of</p> <p>9 books, exposés, investigative reporting, position</p> <p>10 papers, and analyses by third parties.</p> <p>11 Q Has NetChoice ever deactivated a member</p> <p>12 from membership of NetChoice?</p> <p>13 MR. DISHER: Objection. Scope.</p> <p>14 THE WITNESS: To the best of my</p> <p>15 knowledge, NetChoice has never -- and by</p> <p>16 "deactivated," I presume you mean kicked out or</p> <p>17 removed --</p> <p>18 BY MS. CORBELLO:</p> <p>19 Q Uh-huh.</p> <p>20 A -- a member.</p> <p>21 Q Turning back to paragraph 6. The last</p> <p>22 sentence there talks about HB20 creating long-term</p>	<p>93</p>

<p>1 adverse impacts when it comes to NetChoice's 2 members' reputations. 3 Do you see that? 4 A Yes, I see that. 5 You're referring to the phrase "would 6 irreparably harm" when you say "adversely"?</p> <p>7 Q Yes -- sorry -- starting with "would 8 irreparably harm our members and their business 9 models by repelling users and advertisers and 10 creating long-term adverse impacts when it comes to 11 our members' reputation."</p> <p>12 Do you have personal knowledge as to how 13 each one of NetChoice's members would be irreparably 14 harmed were HB20 to go into effect?</p> <p>15 MR. DISHER: Objection. Form.</p> <p>16 THE WITNESS: You're calling for me to 17 speculate?</p> <p>18 BY MS. CORBELLO:</p> <p>19 Q No.</p> <p>20 I'm asking do you have personal knowledge 21 as to how each one of your members would be 22 irreparably harmed were HB20 to go into effect.</p>	<p>94</p> <p>1 Will you be able to tell me that? 2 MR. DISHER: Objection. Form. 3 THE WITNESS: I cannot give you the exact 4 cost for each member as it will be different for 5 each member. However -- and such costs include 6 permanent and irreparable harm to brands which 7 oftentimes does not have a clear financial number 8 but can range anywhere from hundreds of thousands to 9 millions to billions of dollars due to lost future 10 revenue and lost immediate revenue. 11 BY MS. CORBELLO: 12 Q And as you sit here today, for each one 13 of the members that you've listed, do you have any 14 sort of approximation on that second cost figure you 15 just talked about for any of them? 16 MR. DISHER: Objection. Form. 17 THE WITNESS: Due for the vagaries of 18 HB20, I cannot for certain say which member will or 19 will not be covered due to the vague definition of 20 social media nor the requirement of 50 million 21 active users. 22</p>
<p>1 If the answer is no, I do not want you to 2 speculate.</p> <p>3 MR. DISHER: Objection. Form.</p> <p>4 THE WITNESS: If HB20 went into effect, 5 based on prior actions of advertisers and users, we 6 know that NetChoice members would be forced to host 7 lawful but awful content including hate speech, 8 self-harm, mutilation, abuse of animals, Nazi 9 propaganda, holocaust denial, many other forms of 10 speech that would be offensive to its users and its 11 advertisers causing irreparable harm to the brands 12 of those businesses along with the financial losses 13 that they would see as a result of being required to 14 host this horrible content.</p> <p>15 BY MS. CORBELLO:</p> <p>16 Q So if I'm -- if I were to turn back to 17 your list of members -- and I believe it was 18 paragraph 4 -- and we go one by one, will you be 19 able to tell me how each one of those members is 20 irreparably harmed, how that irreparable harm comes 21 about, and what it will cost each one of them once 22 this irreparable harm takes place?</p>	<p>95</p> <p>1 BY MS. CORBELLO: 2 Q Mr. Szabo, you just talked about a cost 3 that you cannot define for several reasons. You 4 said it could be, you know, hundreds of dollars, 5 several million, billions. That's the number I'm 6 talking about. 7 If we go member by member, are you going 8 to be able to give me what each member's 9 approximation of what that cost is going to be? 10 MR. DISHER: Objection. Form. 11 THE WITNESS: I cannot give you each 12 member's direct impact because it is unclear whether 13 they would be covered by HB20. 14 For the members that are -- that would be 15 covered, which include Facebook, Google, and 16 Twitter, we know from prior experience when this 17 type of offensive content was on one of these 18 services, they lost hundreds of millions of dollars 19 due to lost advertising revenue. 20 It does not include, in that figure, the 21 lost brand recognition and irreparable harm from the 22 damage to the brand often gaining future advertisers</p>

<p>1 and future users.</p> <p>2 BY MS. CORBELLO:</p> <p>3 Q Let's take Twitter, for example, then.</p> <p>4 What is Twitter's estimated cost -- or</p> <p>5 loss of -- well, how do I want to ask this?</p> <p>6 What has Twitter estimated would be the</p> <p>7 cost associated with having to comply with HB20?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: I do not know what Twitter</p> <p>10 has estimated their costs to be.</p> <p>11 BY MS. CORBELLO:</p> <p>12 Q And with respect to just Twitter, what</p> <p>13 within their algorithms would have to change in</p> <p>14 order to comply with HB20 were it to go into effect?</p> <p>15 MR. DISHER: Objection. Form.</p> <p>16 THE WITNESS: With respect to their</p> <p>17 algorithms, they would have to be reprogrammed in</p> <p>18 ways to allow for offensive content that is</p> <p>19 currently not allowed under the existing community</p> <p>20 standards, community guidelines, editorial</p> <p>21 discretion, and viewpoints of Twitter.</p> <p>22</p>	<p>1 the Twitter site.</p> <p>2 BY MS. CORBELLO:</p> <p>3 Q Has Twitter told NetChoice that it would</p> <p>4 have to hire programmers if HB20 were to go into</p> <p>5 effect?</p> <p>6 A Twitter has not told NetChoice that it</p> <p>7 would need to hire programmers if HB20 went into</p> <p>8 effect.</p> <p>9 Q When user-generated content is created</p> <p>10 and goes to any one of NetChoice member's platforms,</p> <p>11 do you understand that there's a process that takes</p> <p>12 place, whether a combination of AI and human, solely</p> <p>13 AI, solely human, in which that content is reviewed?</p> <p>14 Is that -- do we have the same</p> <p>15 understanding of how that works?</p> <p>16 A It will depend on the platform that we</p> <p>17 are talking about.</p> <p>18 Q When you say "it will depend," it'll</p> <p>19 depend how that content gets moderated by each</p> <p>20 platform?</p> <p>21 MR. DISHER: Objection. Form.</p> <p>22 THE WITNESS: Different platforms have</p>
<p>99</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q How would that reprogramming take place?</p> <p>3 A Twitter would be required to hire -- or</p> <p>4 use human labor to engage in reprogramming as well</p> <p>5 as attorneys to review new community guidelines to</p> <p>6 write and update new terms of service and could</p> <p>7 likely result in the -- or actually would result in</p> <p>8 the loss of users and advertisers.</p> <p>9 Q And what you just -- you just described,</p> <p>10 how much would this cost Twitter?</p> <p>11 MR. DISHER: Objection. Form.</p> <p>12 THE WITNESS: If Twitter were to retain</p> <p>13 an estimated 50 programmers, each of whom bill out,</p> <p>14 for assumption let's say \$1,000 an hour, you're</p> <p>15 already looking at \$50,000 per hour. If this takes</p> <p>16 200 hours, you're now looking at \$20 million for the</p> <p>17 programmers alone which does not include the</p> <p>18 requisite attorneys and other infrastructure</p> <p>19 necessary to implement this and also does not</p> <p>20 include the need to integrate their advertising</p> <p>21 division to speak with advertisers about the</p> <p>22 impending awful content that will soon be present on</p>	<p>101</p> <p>1 different content moderation procedures. Some</p> <p>2 engage in a top-down content moderation process;</p> <p>3 some engage in a bottom-up content moderation</p> <p>4 process; some have an exceptionally limited content</p> <p>5 moderation process.</p> <p>6 BY MS. CORBELLO:</p> <p>7 Q Which of NetChoice's members permit users</p> <p>8 to moderate the content in any way that they do or</p> <p>9 do not want to see?</p> <p>10 MR. DISHER: Objection. Form.</p> <p>11 THE WITNESS: In what ways are you saying</p> <p>12 content moderate?</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q Well, so Facebook, for example, a user</p> <p>15 accesses the -- what is it called? The blue site?</p> <p>16 I don't use Facebook.</p> <p>17 MR. MARCHESE: The main one?</p> <p>18 MS. CORBELLO: The main one.</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q -- blue site.</p> <p>21 They have essentially what's called a</p> <p>22 news feed; correct?</p>

<p>1 A Yes.</p> <p>2 Q Okay. Are users on Facebook able to 3 moderate what they see in their news feed or what 4 they don't want to see in their news feed in any 5 way?</p> <p>6 A Users on Facebook can put requests in to 7 not show again. And, likewise, as they use the 8 site, the site will better identify what type of 9 content the user is seeking.</p> <p>10 Simultaneously, Facebook will make its 11 editorial discretion and advance its viewpoints as 12 part of news feeds.</p> <p>13 MS. CORBELLO: Okay. I'm going to object 14 as non-responsive for everything after "Facebook 15 will make."</p> <p>16 BY MS. CORBELLO:</p> <p>17 Q The abilities of the users on Facebook 18 that you just described, let's now apply that to all 19 its members.</p> <p>20 Do you know whether or not each one of 21 NetChoice's members offer its users the ability to 22 moderate the content that it does or does not see</p>	<p>102</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q Not Alibabi. Their users.</p> <p>3 Do their users, when they log onto the 4 site and they see this shopping -- I think you 5 called it a shopping cart or shopping page -- do 6 those users have any ability to modify or dictate 7 what content they view?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: By using the site, users 10 dictate what type of content will be shown to them 11 as Alibaba seeks to provide the best results and the 12 most likely products for that specific user.</p> <p>13 BY MS. CORBELLO:</p> <p>14 Q So how do users dictate what they see on 15 the Alibaba site?</p> <p>16 A By using the site, Alibaba will identify 17 what products are most likely to be appealing to 18 that user.</p> <p>19 Q Can users choose to hide certain products 20 on the Alibabi site that they don't want to see?</p> <p>21 A I do not know.</p> <p>22 Q Let's go to paragraph 9.</p>
<p>1 somewhat in the same way that we just talked about 2 with Facebook?</p> <p>3 MR. DISHER: Objection. Form.</p> <p>4 THE WITNESS: Because of the diversity of 5 the NetChoice membership, many NetChoice members do 6 not have a news feed as you described. Alibaba or 7 OfferUp are two examples of that.</p> <p>8 BY MS. CORBELLO:</p> <p>9 Q So when a user logs onto Alibaba, what do 10 they see?</p> <p>11 A They would see a shopping center which 12 involves content posted by sellers.</p> <p>13 Q Can a user of Alibaba -- do they have any 14 discretion to dictate what that site looks like when 15 they log on?</p> <p>16 A Alibaba will engage in its editorial 17 discretion to decide and show what is best for its 18 customers and present them with products that they 19 think might be most appealing.</p> <p>20 MS. CORBELLO: Okay. I'm going to object 21 as non-responsive.</p> <p>22</p>	<p>103</p> <p>104</p> <p>1 Go ahead and just let me know when you're 2 ready.</p> <p>3 A Okay.</p> <p>4 Q Paragraph 9 talks about the World 5 Federation of Advertisers; right?</p> <p>6 A Yes.</p> <p>7 Q And is this paragraph meant to, 8 essentially, summarize the World Federation of 9 Advertisers' point of view of -- well, let me ask it 10 this way: What are you trying to -- what 11 information are you trying to summarize in 12 paragraph 9?</p> <p>13 A Many NetChoice members' entire business 14 model ultimately results from advertising revenue. 15 The World Federation of Advertisers, which is a 16 leading global trade association for the 17 advertisers, makes clear that the presence of 18 content that would be required to be hosted under 19 HB20 on our member sites would result in a harm to 20 advertisers and, likewise, a harm to the advertising 21 ecosystem on which many NetChoice members rely for 22 revenue.</p>

<p>1 Q Are you aware that Facebook funds the 2 World Federation of Advertisers? 3 MR. DISHER: Objection. Form. 4 Objection. Scope. 5 THE WITNESS: I did not know that. 6 BY MS. CORBELLO: 7 Q Are you aware that Google contributes to 8 the World Federation of Advertisers financially? 9 MR. DISHER: Same objections. 10 THE WITNESS: No. 11 BY MS. CORBELLO: 12 Q Are you aware that there -- the World 13 Federation of Advertisers' website says, quote, 14 Google and Facebook are a big part of the market 15 estimated to take more than 75 percent of digital 16 ads spent worldwide, unquote? 17 MR. DISHER: Objection. Form. 18 THE WITNESS: Yes, I was aware. 19 BY MS. CORBELLO: 20 Q Does the fact that these two plat- -- or 21 these two members take up this much digital ad space 22 change your opinion at all about how willing</p>	<p>106</p> <p>1 that I mean the California Consumer Protection Act? 2 A Yes. 3 Q Okay. You said NetChoice was involved 4 in -- well, scratch that. 5 CCPA is in effect now; right? 6 A CCPA took effect, yes. 7 Q Do you know approximately when it took 8 effect? 9 A Approximately June of -- I believe it was 10 2019, 2020. 11 Q Once the CCPA took effect or just 12 immediately prior to that happening, how did each 13 one of NetChoice's members have to modify their 14 practices to comply with that law? 15 MR. DISHER: Objection. Scope. 16 Objection. Form. 17 THE WITNESS: Billions of dollars were 18 spent on legal expenses to come into compliance with 19 CCPA by NetChoice members. 20 BY MS. CORBELLO: 21 Q The legal costs were about compliance 22 with CCPA?</p>		
<p>107</p> <p>1 advertisers would be to abandon those sites? 2 MR. DISHER: Objection. Form. 3 THE WITNESS: It does not change the 4 willingness of advertisers to abandon those 5 websites. 6 MS. CORBELLO: Can we take a quick break? 7 MR. DISHER: Sure. 8 THE VIDEOGRAPHER: We are going off the 9 record. 10 This is the end of media unit number 2. 11 The time is 5:29 p.m. 12 (A recess was taken.) 13 THE VIDEOGRAPHER: We are back on the 14 record. 15 This is the beginning of media unit 16 number 3. 17 The time is 5:38 p.m. 18 BY MS. CORBELLO: 19 Q Do you remember talking a little bit ago 20 about the California Consumer Protection Act? 21 A Yes. 22 Q If I start saying "CCPA," can we agree</p>	<p>109</p> <p>1 Were any of those for litigation against 2 CCPA? 3 A To the best of my knowledge, no NetChoice 4 member has brought litigation against CCPA. 5 Q For any of those members, do you know why 6 they have chosen to not bring a suit against CCPA? 7 MR. DISHER: I will instruct the witness 8 you may answer but not to the extent that it might 9 disclose any conversations you've had with legal 10 counsel. 11 THE WITNESS: I do not know. 12 BY MS. CORBELLO: 13 Q Are any of your members currently not in 14 compliance with the CCPA? 15 MR. DISHER: Objection. Scope. 16 Objection. Form. 17 THE WITNESS: To the best of my 18 knowledge, all NetChoice members comply with all 19 applicable laws and regulations. 20 BY MS. CORBELLO: 21 Q And that includes CCPA? 22 MR. DISHER: Same objection.</p>		

<p>1 THE WITNESS: To the best of my 2 knowledge, all NetChoice members comply with CCPA. 3 BY MS. CORBELLO: 4 Q Do any of NetChoice's members have to 5 treat users in California differently than users in 6 any other part of the United States as a result of 7 CCPA being in effect? 8 MR. DISHER: Objection. Form. 9 Objection. Scope. 10 THE WITNESS: The CCPA law requires 11 NetChoice members to treat California residents in a 12 way in compliance with that law. 13 However, some NetChoice members may have 14 been required, due to legal costs, technological 15 challenges, to apply CCPA to all users. 16 BY MS. CORBELLO: 17 Q Are you aware of which members fall into 18 the first category you're talking about, treating 19 California users differently, versus members that 20 fall into the second one in which they apply CCPA 21 compliance across all users in the United States? 22 MR. DISHER: Objection. Scope.</p>	<p>110</p> <p>1 MR. DISHER: Objection. Form. 2 THE WITNESS: Discussion of such issues 3 would violate an NDA that we have with our members. 4 BY MS. CORBELLO: 5 Q When, approximately, did you draft this 6 declaration that's been marked as Defense Exhibit 1? 7 A Are you asking when I began drafting? 8 Q Sure. Let's start with that. 9 When did you begin drafting this 10 declaration, Defense Exhibit 1? 11 A I began drafting this declaration, 12 Exhibit 1, in September of 2021. 13 Q Do you remember the approximate date that 14 you started drafting it? 15 A I do not recall. 16 Q Was it early September 2021? 17 A I do not recall. 18 Q Who -- and I don't need to know the 19 content of the discussions, but who did you speak 20 with during the course of your drafting of this 21 declaration, Defense Exhibit 1? 22 A During the drafting of this declaration,</p>
<p>111</p> <p>1 THE WITNESS: I did not review that 2 information prior to this deposition as such 3 information is not addressed in my declaration. 4 BY MS. CORBELLO: 5 Q Are you able to identify what documents 6 would provide you that information? 7 A To identify that information, I would 8 need to review the publicly available privacy 9 policies of each NetChoice member to identify how 10 they address compliance with CCPA. 11 Q Is NetChoice currently involved in any 12 activities aimed at getting rid of the CCPA? 13 A NetChoice is not actively involved in any 14 activities to get rid of the CCPA. 15 Q Does NetChoice fund any other groups for 16 the purpose of attempting to get rid of the CCPA? 17 A NetChoice does not fund any other groups 18 for purposes of repealing CCPA. 19 Q Thank you. That was the word I was 20 looking for. 21 Are any of NetChoice's members actively 22 working to repeal CCPA?</p>	<p>113</p> <p>1 this exhibit, I spoke with NetChoice in-house 2 counsel and NetChoice outside counsel. 3 Q Who else did you speak with? 4 A Those are the only two individuals I 5 spoke with in the drafting of this declaration. 6 Q So between the time you started drafting 7 this declaration and, it looks like, 8 September 30th, when you signed the declaration, 9 you spoke to both NetChoice in-house counsel and 10 NetChoice outside counsel and no one else; is that 11 right? 12 A To the best of my knowledge, that is 13 correct. 14 Q The statements made in this declaration 15 reflect your personal knowledge of the issues 16 discussed; right? 17 A That is correct. 18 Q You produced documents that you consulted 19 in drafting this declaration; right? 20 A We produced documents that we used and 21 consulted in drafting this declaration. 22 Q When you say "we," who are you referring</p>

<p>1 to?</p> <p>2 A NetChoice.</p> <p>3 Q And did you personally review each one of</p> <p>4 the documents that have been produced?</p> <p>5 A I reviewed the documents that were</p> <p>6 reviewed -- or -- sorry. I reviewed the documents</p> <p>7 that NetChoice produced in response to the ones used</p> <p>8 in the creation of this declaration.</p> <p>9 Q You reviewed every single one of the</p> <p>10 documents?</p> <p>11 A I reviewed the documents that were used</p> <p>12 and submitted in the creation of this declaration.</p> <p>13 Q Are there any documents that were</p> <p>14 produced that you did not personally review?</p> <p>15 A Not to my knowledge.</p> <p>16 Q Are there any documents outside of those</p> <p>17 that were already produced that you relied on when</p> <p>18 drafting this declaration?</p> <p>19 A Not to my knowledge.</p> <p>20 Q Your declaration discusses the various</p> <p>21 burdens that will -- that your members will suffer</p> <p>22 should HB20 go into effect. Is that fair?</p>	<p>114</p> <p>1 content moderation.</p> <p>2 BY MS. CORBELLO:</p> <p>3 Q Just to clarify, this loss of inability</p> <p>4 to stop bad actors, is this not contained in your</p> <p>5 declaration currently?</p> <p>6 Is this an example you're giving me of</p> <p>7 irreparable harm that you did not provide within the</p> <p>8 declaration?</p> <p>9 A This is an example of an irreparable harm</p> <p>10 that is not explicitly stated in the declaration but</p> <p>11 is part of the greater irreparable harm that will be</p> <p>12 faced by NetChoice members.</p> <p>13 Q Okay. So other than this loss of</p> <p>14 inability to stop bad actors, what are all of the</p> <p>15 other specific irreparable harms that have not</p> <p>16 already been identified in the declaration that</p> <p>17 NetChoice's members will suffer if HB20 goes into</p> <p>18 effect?</p> <p>19 A One of the irreparable harms that is</p> <p>20 alluded to but not specifically called out in the</p> <p>21 declaration is enabling bad actors such as spammers,</p> <p>22 hate-speech mongers, Neo-Nazis, Holocaust deniers to</p>
<p>1 A Our declaration discusses the irreparable</p> <p>2 harms that our members will suffer if HB20 goes into</p> <p>3 effect as part of the overall statements in the</p> <p>4 declaration.</p> <p>5 Q Does your declaration provide all of the</p> <p>6 irreparable harms that NetChoice contends will</p> <p>7 befall its members if HB20 goes into effect?</p> <p>8 A Given that that will require me to make</p> <p>9 speculations about all possible things, that was not</p> <p>10 necessarily included in our declaration.</p> <p>11 However, we did include in our</p> <p>12 declaration clear irreparable harms that our members</p> <p>13 will face if HB20 goes into effect.</p> <p>14 Q As you sit here today, are there any</p> <p>15 specific irreparable harms that you know of that are</p> <p>16 not included somewhere in this declaration?</p> <p>17 MR. DISHER: Objection. Form.</p> <p>18 THE WITNESS: So one irreparable harm, as</p> <p>19 an example, that would be incurred would be a loss</p> <p>20 of inability to stop bad actors from posting content</p> <p>21 on member services due to the mandated disclosure of</p> <p>22 proprietary ways that NetChoice members engage in</p>	<p>115</p> <p>117</p> <p>1 know ways to circumvent the values and content</p> <p>2 moderation standards and editorial discretion of</p> <p>3 NetChoice members.</p> <p>4 Q What other specific irreparable harms did</p> <p>5 you not discuss in your declaration?</p> <p>6 A That is all that I can think of right</p> <p>7 now.</p> <p>8 Q Is there a reason that you did not</p> <p>9 specify these two irreparable harms we just talked</p> <p>10 about within your declaration?</p> <p>11 MR. DISHER: I'll instruct the witness</p> <p>12 not to answer to the extent it discloses any</p> <p>13 communications you've had with counsel.</p> <p>14 Other than that, please go ahead and</p> <p>15 answer.</p> <p>16 THE WITNESS: On advice of my counsel, I</p> <p>17 will not answer.</p> <p>18 BY MS. CORBELLO:</p> <p>19 Q Your declaration discusses broadly your</p> <p>20 members' content moderation practices and how those</p> <p>21 may be affected by HB20; is that correct?</p> <p>22 A That is correct, in broad descriptions of</p>

<p>1 how HB20 will impact the ability of NetChoice 2 members to express their values and their editorial 3 discretion.</p> <p>4 Q So specifically as to the ways in which 5 HB20 will impact NetChoice's members' content 6 moderation abilities or policies, is there 7 anything -- are any of those impacts not discussed 8 within this disclosure?</p> <p>9 MR. DISHER: Objection. Form.</p> <p>10 THE WITNESS: Sorry. Can you -- is this 11 substantially different from the prior question?</p> <p>12 BY MS. CORBELLO:</p> <p>13 Q No. It's essentially the burden's 14 question but as to the impacts on content -- the 15 ability to moderate content.</p> <p>16 MR. DISHER: Objection. Form.</p> <p>17 THE WITNESS: By forcing NetChoice 18 members to engage in detailed descriptions of 19 certain content moderation practices, it will, in 20 part, impede the ability to adapt to new threats 21 that violate the values and editorial discretion of 22 NetChoice members. It will simultaneously empower</p>	<p>1 disclosure a moment ago; right?</p> <p>2 MR. DISHER: Objection. Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MS. CORBELLO:</p> <p>5 Q So my question's a little different.</p> <p>6 Maybe -- well, let me give you an example.</p> <p>7 There's discussion in this declaration 8 about how maybe the algorithms might have to change 9 that are used to moderate content because of the way 10 in which HB20 will affect these -- the members; is 11 that right?</p> <p>12 A That is correct.</p> <p>13 Q So that is one way in which HB20 will be 14 affecting members' content moderation practices in 15 that they will have to modify what their content 16 moderation algorithms currently look like; is that 17 right?</p> <p>18 A Under HB20, NetChoice members will be 19 required to change content moderation practices, 20 which include computer and human review, in ways 21 that violate their values and their editorial 22 discretion and in ways that they do not view as best</p>
<p>1 bad actors whose viewpoints, values, and 2 editorial -- and opinions do not match those of 3 NetChoice members.</p> <p>4 BY MS. CORBELLO:</p> <p>5 Q Does your declaration contain all the 6 ways in which HB20 will impact NetChoice's members 7 in regards to their content moderation practices and 8 policies?</p> <p>9 MR. DISHER: Objection. Form.</p> <p>10 THE WITNESS: It is -- it does not cover 11 all the myriad of costs and harms and irreparable 12 harms that will befall NetChoice members when they 13 lose the ability to express their values --</p> <p>14 BY MS. CORBELLO:</p> <p>15 Q Well --</p> <p>16 A -- and their --</p> <p>17 Q Okay.</p> <p>18 A -- editorial discretion in the way that 19 is best for their users and their advertisers as 20 guaranteed under the First Amendment.</p> <p>21 Q Well -- so we've talked about the 22 irreparable harms that were missing from your</p>	<p>1 for their values, their users, and their 2 advertisers.</p> <p>3 Q Are there any other ways in which HB20 4 will impact -- let's start with will impact the 5 content moderation practices of each one of 6 NetChoice's members that are -- that is not 7 contained in this declaration?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: The ways that HB20 will 10 create irreparable harm in the content moderation 11 manner that NetChoice members engage in that is not 12 included in this declaration as stated in 13 paragraph 20 when we state that the non-exclusive 14 list of harmful and offensive content is clear that 15 there is much more, such as abuse of animals, such 16 as Holocaust denial, neither of which were included 17 in the non-exclusive list listed in paragraph 20.</p> <p>18 MS. CORBELLO: I'm going to object as 19 non-responsive.</p> <p>20 BY MS. CORBELLO:</p> <p>21 Q We'll talk about paragraph 20 since you 22 referred to it.</p>

<p>1 Right before that list, it says:</p> <p>2 "NetChoice members would be forced to host harmful</p> <p>3 and offensive content"; right?</p> <p>4 A That is what the declaration says.</p> <p>5 Q And so you are attesting that one of the</p> <p>6 ways in which HB20's policies will affect the way in</p> <p>7 which the members moderate content is that it will</p> <p>8 require them to host harmful and offensive content.</p> <p>9 Is that fair?</p> <p>10 A The declaration states that NetChoice</p> <p>11 members will be forced to host harmful and offensive</p> <p>12 content including, but not limited to --</p> <p>13 Q You don't need to read the list again.</p> <p>14 A Okay.</p> <p>15 Q I'm really trying to get us out of here.</p> <p>16 Do NetChoice members currently host</p> <p>17 harmful and offensive content?</p> <p>18 MR. DISHER: Objection. Form.</p> <p>19 BY MS. CORBELLO:</p> <p>20 Q Or is this a change that will have to</p> <p>21 occur as a result of HB20?</p> <p>22 MR. DISHER: Same objection.</p>	<p>122</p> <p>1 Are you with me on that?</p> <p>2 A HB20 modifies the values and editorial</p> <p>3 decisions of NetChoice members which are reflected</p> <p>4 in the ways that they engage in content moderation.</p> <p>5 Q Where it says "NetChoice members would be</p> <p>6 forced to host harmful and offensive content," you</p> <p>7 are saying that that is because of the provisions</p> <p>8 within HB20 and -- were they to go into effect?</p> <p>9 Is that what you're attempting to say in</p> <p>10 that sentence?</p> <p>11 A In the last sentence in paragraph 20, we</p> <p>12 are making clear that, under HB20, NetChoice members</p> <p>13 will be forced to host harmful and offensive content</p> <p>14 including, but not limited to, racial epithets, Nazi</p> <p>15 anti-Semitism --</p> <p>16 Q I promise you, you don't need to read</p> <p>17 them over.</p> <p>18 So would you agree with me that you -- in</p> <p>19 this sentence, you are providing one way in which</p> <p>20 you contend HB20's provisions are going to alter the</p> <p>21 way in which members moderate content, or are you</p> <p>22 saying that this is the only way in which HB20's</p>
<p>123</p> <p>1 Go ahead.</p> <p>2 THE WITNESS: NetChoice members expend</p> <p>3 millions of dollars to ensure that harmful and</p> <p>4 offensive content, as listed in paragraph 20, does</p> <p>5 not appear on its site and does so to the best of</p> <p>6 their ability.</p> <p>7 BY MS. CORBELLO:</p> <p>8 Q And HB- -- is it NetChoice's position</p> <p>9 that HB20 requires harmful and offensive content to</p> <p>10 be posted on these members' platforms?</p> <p>11 MR. DISHER: Objection. Form.</p> <p>12 THE WITNESS: HB20 will require NetChoice</p> <p>13 members to host harmful and offensive content</p> <p>14 including, but not limited to --</p> <p>15 BY MS. CORBELLO:</p> <p>16 Q You really don't need to read the list</p> <p>17 over again. I promise.</p> <p>18 So what you just discussed, is one of the</p> <p>19 ways -- getting back to my original question. Is</p> <p>20 one of the ways in which HB20 modifies the practices</p> <p>21 of NetChoice's members insomuch as they relate to</p> <p>22 content moderation?</p>	<p>125</p> <p>1 provisions are going to alter the way members</p> <p>2 moderate content?</p> <p>3 A We are using, in this last sentence in</p> <p>4 paragraph 20, an illustrative list that is</p> <p>5 including, but not limited to --</p> <p>6 Q I'm not talking about the list.</p> <p>7 A -- those listed to explain the types of</p> <p>8 loss of values and editorial discretion the</p> <p>9 NetChoice members will be faced with if HB20 came</p> <p>10 into effect.</p> <p>11 Q So one example?</p> <p>12 MR. DISHER: Objection. Form.</p> <p>13 THE WITNESS: One example of what?</p> <p>14 BY MS. CORBELLO:</p> <p>15 Q Well, I'm trying to get my original</p> <p>16 question asked and answered.</p> <p>17 NetChoice's members would be forced to</p> <p>18 host harmful and offensive content. Is that one</p> <p>19 example?</p> <p>20 I'm not asking about the list but the</p> <p>21 broader statement of having to host harmful and</p> <p>22 offensive content. Is that one example of the way</p>

<p>1 in which HB20's provisions are going to impact 2 NetChoice's members' content moderation practices or 3 is it the only way? 4 A It is one way in which HB20 will cause 5 irreparable harm to NetChoice members. 6 Q I didn't ask about irreparable harm. I 7 asked about a modification of content moderation 8 practices. 9 Can you answer the question as it relates 10 to that? 11 A HB20 will have other impacts than those 12 listed for harmful and offensive content when it 13 takes effect for NetChoice members. 14 MS. CORBELLO: Can you read out my 15 original question again, please. 16 (Whereupon, the requested question 17 was 18 read back.) 19 THE WITNESS: So the example listed in 20 the last sentence of paragraph 20 is one example of 21 the type of impact to content moderation practices 22 that HB20 will have --</p>	<p>126 1 declaration? 2 MR. DISHER: Objection. Form. 3 MS. CORBELLO: What's the basis of the 4 objection, Todd? 5 MR. DISHER: It calls for a legal 6 conclusion about how HB20 is going to take effect, 7 what its provisions -- 8 MS. CORBELLO: I'm asking what he hasn't 9 said in his own declaration. 10 MR. DISHER: And the effects of HB20 11 depend on interpreting the often-vague provisions of 12 HB20 as a matter of law. 13 To the -- 14 MS. CORBELLO: So is the sentence in 15 paragraph 20 a legal conclusion, then? 16 MR. DISHER: To the extent that he can 17 answer the question, go ahead. 18 To the extent it calls for a legal 19 conclusion -- he's not here to testify as a lawyer 20 about what NetChoice's legal positions are in the 21 case. But to the extent you have factual knowledge 22 or can answer the question as a matter of fact,</p>
<p>1 BY MS. CORBELLO: 2 Q Okay. 3 A -- on NetChoice members. 4 Q Now, taking the understanding that we 5 were talking about ways in which NetChoice's members 6 will be impacted in the way that they are able to 7 moderate content, are there any other specific ways 8 in which HB20 will impact NetChoice members' content 9 moderation practices that are not discussed in your 10 declaration? 11 MR. DISHER: Objection. Form. 12 THE WITNESS: Yes, there are other ways 13 that NetChoice members will be impacted in content 14 moderation practices that are not described in the 15 last sentence of paragraph 20. 16 BY MS. CORBELLO: 17 Q I didn't ask solely about the last 18 sentence of paragraph 20. 19 In the entirety of your declaration, 20 which ways in which HB20 will impact specifically 21 NetChoice members' content moderation practices are 22 not already contained in the entirety of your</p>	<p>127 129 1 please, by all means. 2 THE WITNESS: In addition to being forced 3 to host the content described in the last sentence 4 of paragraph 20, NetChoice members will have to work 5 with -- sorry -- some NetChoice members will be 6 required to work with human reviewers to update them 7 to new content moderation practices specifically 8 forcing them to host the harmful and offensive 9 content including, but not limited to, the 10 content -- 11 BY MS. CORBELLO: 12 Q Please don't. Please, you don't need to 13 read them out. 14 A -- in the last sentence of paragraph 20. 15 Q Thank you. 16 And so this one example you just gave, 17 that's not contained in your declaration currently? 18 The having to -- I think you said interact with 19 human programmers? 20 A It is not expressly stated in the 21 declaration. 22 Q What are the other ways in which HB20</p>

<p>1 will impact the members' content moderation 2 practices that are not stated in the declaration 3 already?</p> <p>4 A One of the ways that members' content 5 moderation practices will be impacted that is not 6 stated in the declaration include the changes to the 7 way the advertising division works with its 8 customers to make them aware that harmful and 9 offensive content will become present on NetChoice 10 members' platforms.</p> <p>11 Q Does every one of NetChoice members have 12 an ad division?</p> <p>13 A Can you give me a definition of 14 "advertising division," please?</p> <p>15 Q You used the term first. So however 16 you -- whatever you believe that term encompasses.</p> <p>17 A All NetChoice members engage in 18 advertising.</p> <p>19 Q That wasn't my question.</p> <p>20 Do all -- do all NetChoice members have a 21 specific ad division within their company?</p> <p>22 A To the best of my knowledge, every</p>	<p>130</p> <p>1 would require me to engage in speculation and 2 drawing legal conclusions which are beyond the scope 3 of the purpose of this deposition and limited to 4 what is included in this declaration.</p> <p>5 Q Well, your declaration talks about the 6 ways in which HB20 will impact your members' 7 abilities to engage in content moderation; right?</p> <p>8 A My declaration discusses ways in which my 9 members will be impacted by HB20 and in ways in 10 which the content moderation decisions of my members 11 will be impacted by HB20.</p> <p>12 Q So yes?</p> <p>13 A To?</p> <p>14 Q My original question.</p> <p>15 A My declaration outlines ways in which 16 NetChoice members will have to engage in harm -- 17 irreparable -- sorry. My declaration explains how 18 NetChoice members will suffer irreparable harm and 19 have to engage in -- as they engage in content 20 moderation changes due to HB20.</p> <p>21 MS. CORBELLO: Objection.</p> <p>22 Non-responsive.</p>
<p>131</p> <p>1 NetChoice members -- every NetChoice member has a 2 division within its business that engages in 3 advertising.</p> <p>4 Q Okay. What are the other ways in which 5 HB20 will affect the members' content moderation 6 practices that are not already contained in your 7 declaration?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: At this point, what I would 10 say will be speculative and potentially require me 11 to reach a legal conclusion which the vagaries of 12 HB20, its definitions and its requirements for 13 applicability, would demand, and I do not have that 14 power to do that right now for purposes of this 15 declaration and deposition.</p> <p>16 BY MS. CORBELLO:</p> <p>17 Q So just to be clear, as you sit here 18 today, you don't have any other specific ways in 19 which HB20 impacts NetChoice's members' ability to 20 moderate content other than what we've already 21 discussed?</p> <p>22 A Beyond what we have already discussed</p>	<p>133</p> <p>1 BY MS. CORBELLO:</p> <p>2 Q You just told me a moment ago that any 3 other ways in which HB20 impacts NetChoice's members 4 and the ways in which they moderate content you 5 cannot provide because it would be speculative, and 6 it would require you to reach a legal conclusion.</p> <p>7 Is that accurate?</p> <p>8 MR. DISHER: Objection. Form.</p> <p>9 THE WITNESS: I previously stated that 10 further examples of irreparable harm of content 11 moderation that NetChoice members would suffer due 12 to HB20 would require me to be speculative and reach 13 a legal conclusion.</p> <p>14 BY MS. CORBELLO:</p> <p>15 Q So based on that, is it fair to say that 16 you do have other ways in which you believe, even 17 based on a speculative reasoning, that HB20 will 18 impact NetChoice's members' content moderation 19 practices, but you are not going to disclose those 20 ways for the reasons you stated?</p> <p>21 MR. DISHER: Objection. Form.</p> <p>22 THE WITNESS: Doing so would -- to make</p>

1 such an assertion would require me to be -- to 2 engage in speculation and/or make a legal conclusion 3 which is beyond the scope of my declaration and the 4 purpose of this deposition. 5 BY MS. CORBELLO: 6 Q I'll keep asking it. 7 Do you either have more ways in which 8 HB20 will -- will affect your members' ability to 9 moderate content and you are not providing it for 10 the reasons you discussed, or do you not have any 11 other specific ways and you're simply not providing 12 them because you don't have them? 13 MR. DISHER: Objection. Form. 14 THE WITNESS: To identify other ways 15 NetChoice members will be irreparably harmed in 16 their content moderation decisions, which include 17 their choice of editorial activities and advancing 18 their values, would require me to engage in 19 speculation and/or draw a legal conclusion. 20 BY MS. CORBELLO: 21 Q So as you sit here today, you have more 22 ways in which HB20 will affect your members' content	134 1 (Whereupon, the last question was 2 read back.) 3 MR. DISHER: Objection. Form. 4 THE WITNESS: I am unable to provide the 5 other ways in which NetChoice members will be 6 adversely impacted and irreparably harmed in their 7 content moderation decisions because such activity 8 would be speculative and/or require me to reach a 9 legal conclusion. 10 BY MS. CORBELLO: 11 Q I don't need you to tell me why you 12 cannot provide the reasons or the ways in which HB20 13 impacts members' content moderation practices. I 14 simply need you to respond to whether or not you 15 currently have more ways -- as you sit here today 16 and are thinking about it, you know of more ways in 17 which HB20 would impact its members in terms of 18 content moderation but are not providing them. 19 MR. DISHER: Objection. Form. 20 THE WITNESS: To answer that question, it 21 would require two different answers because it's 22 very close to a compound question going to my
1 moderation practices, but you are not going to 2 provide them. Is that accurate? Yes or no? 3 MR. DISHER: Objection. Form. 4 THE WITNESS: The other ways in which 5 NetChoice members would be irreparably harmed due to 6 their content moderation decisions required under 7 HB20 would be either a legal conclusion or require 8 speculation. 9 MS. CORBELLO: Objection. 10 Non-responsive. 11 BY MS. CORBELLO: 12 Q Mr. Szabo, do you need the court reporter 13 to read it back to you, or can you please provide a 14 responsive answer? 15 MR. DISHER: Objection. Form. 16 THE WITNESS: Could you read back the 17 question, please. 18 Thank you. 19 MR. MARCHESE: If I could jump in? 20 No. 21 MS. CORBELLO: Huh? 22	135 137 1 mens rea. So if you'd like to rephrase the question 2 into two parts, we can maybe answer it that way. 3 MS. CORBELLO: I'm going to object as 4 non-responsive. 5 BY MS. CORBELLO: 6 Q As you sit here today, is there anything 7 that you want to tell me that is not contained in 8 your declaration in regards to HB20 and its effects 9 on -- on NetChoice's members? 10 MR. DISHER: Objection. Form. 11 THE WITNESS: There is nothing that I 12 want to tell you today with -- that has not already 13 been stated with regard to the impact and 14 irreparable harm NetChoice members will suffer to 15 their content moderation decisions, their values, 16 and their ability to engage in editorial discretion 17 that I have not yet shared with you today. 18 BY MS. CORBELLO: 19 Q As you sit here today, is there anything 20 you can think of that you left out of this 21 declaration, Defense Exhibit 1? 22 MR. DISHER: Objection. Form.

1 THE WITNESS: There's much information	138	1 We are off the record at 6:18 p.m.
2 that is not included in Exhibit 1.		2 This concludes today's testimony given by
3 BY MS. CORBELLO:		3 Carl Szabo.
4 Q This "much information" you referred to,		4 (Off the record at 6:18 p.m.)
5 why is it not included in your declaration?		5
6 MR. DISHER: Objection. Form.		6
7 THE WITNESS: There's lots of information		7
8 that is not pertinent to this case, that is		8
9 irrelevant, that is in existence, that is not		9
10 included in the declaration.		10
11 However, the declaration itself is a		11
12 fully formed legal filing that NetChoice has		12
13 produced that shows the NetChoice members will		13
14 suffer irreparable harm and lose the ability to		14
15 engage in editorial discretion and express their		15
16 values if HB20 is allowed to take effect.		16
17 BY MS. CORBELLO:		17
18 Q Is there anything that you left out of		18
19 your declaration that you meant to include?		19
20 A Anything that is or is not included is		20
21 subject to the discussions of myself and my		21
22 attorneys.		22
139		141
1 Q I'm not asking about any discussions		1
2 between your attorneys. It's a yes or no. You		2 Certificate of shorthand reporter - notary public
3 don't have to discuss the content.		3 I, Susan E. Alldridge, Registered Professional
4 Is there anything left out of your		4 Reporter, Certified Shorthand Reporter, the officer
5 declaration that you meant to include?		5 before whom the foregoing deposition was taken, do
6 MR. DISHER: Please answer.		6 hereby certify that the foregoing transcript is a
7 Go ahead.		7 true and correct record of the testimony given; that
8 THE WITNESS: The declaration represents		8 said testimony was taken by me stenographically and
9 a complete filing on behalf of NetChoice and myself.		9 thereafter reduced to typewriting under my
10 BY MS. CORBELLO:		10 supervision; that reading and signing was requested;
11 Q So there is nothing missing from this		11 and that I am neither counsel for or related to, nor
12 declaration, as you sit here today, that you can		12 employed by any of the parties to this case and have
13 think of?		13 no interest, financial or otherwise, in its outcome.
14 MR. DISHER: Objection. Form.		14 IN WITNESS WHEREOF, I have hereunto set my hand
15 THE WITNESS: To the best of my		15 and affixed my notarial seal this 19th day of
16 knowledge, there is nothing that we have not		16 November 2021.
17 included in this declaration.		17
18 MS. CORBELLO: Pass the witness.		18
19 MR. DISHER: We have nothing at this		19 NOTARY PUBLIC IN AND FOR THE DISTRICT OF COLUMBIA
20 time.		
21 MS. CORBELLO: I think we're good.		
22 THE VIDEOGRAPHER: Please stand by.		

Numbers		
100 49:9 1401 6:20 17th 6:21 1:21-cv-00840-RP 6:18 200 99:16 2019 108:10 2020 108:10 2021 6:21 112:12,16 30th 113:8 3:12 6:22 3:49 37:8 3:50 37:12 4:17 61:12 4:30 61:18 502 6:21 5:29 107:11 5:38 107:17 6:18 140:1,4	79:3 79:3,8 accesses 101:15 accessibility 56:20 accessible 55:4 60:6 74:22 accessing 58:8 account 77:9 79:9 85:8,10,14,14,15 86:18 accounts 85:1 86:20 accurate 60:3,5 62:6 133:7 135:2 achieve 34:11 across 29:4,6 79:18 110:21 act 17:4,7 18:6,12, 18,20 27:8 107:20 108:1 Action 6:18 41:21 actions 17:22 41:7 43:11 95:5 active 63:19 96:21 actively 111:13,21 activities 17:7 18:3, 5 19:1 34:15 43:17, 21 93:3 111:12,14 134:17 activity 11:11 85:20 86:6 136:7 actors 86:19 115:20 116:4,14,21 119:1 actually 41:16 60:4 81:19 99:7 adapt 118:20 add 53:17 added 62:3 addition 129:2 additional 23:6 25:17 28:15 address 26:2 27:4 70:6 78:9 111:10 addressed 26:7 111:3 addresses 85:21 ads 22:3 27:15 106:16 advance 49:22 86:7, 12 102:11 advancement 84:7 advancing 134:17 adverse 94:1,10	adversely 94:6 136:6 advertise 33:2 34:1, 13 advertisement 21:4 34:20 advertisements 21:1, 6,9,14,17 22:8 27:7 34:22 35:2,12 advertiser 34:12 advertisers 32:12 41:16 57:3 66:10, 16 77:5 80:14 84:6 87:11 94:9 95:5,11 97:22 99:8,21 105:5,9,15,17,20 106:2,8,13 107:1,4 119:19 121:2 advertises 34:17 advertising 14:5,6 21:7,10 32:21 88:16 97:19 99:20 105:14,20 130:7,14, 18 131:3 advice 117:16 advising 11:7 advocacy 12:20 13:4 38:5,7,15 41:7,21 43:11 advocating 17:21 18:4,22 affect 120:10 122:6 131:5 134:8,22 affected 63:7 117:21 affecting 120:14 afford 29:20 after 7:17 9:13 65:21 79:8 85:9 102:14 afternoon 6:12 7:22 again 92:13 102:7 122:13 123:17 126:15 against 30:14 84:12, 19 109:1,4,6 agencies 38:6 agent 47:18 48:2,14 49:9 agents 49:4 ago 64:4 107:19 120:1 133:2
\$		
\$1,000 99:14 \$20 99:16 \$50,000 99:15		
A		
abandon 107:1,4 abilities 43:5 102:17 118:6 132:7 ability 10:6 33:2 41:12,15,18 44:11, 19 46:17 48:11 50:3 62:20 102:21 104:6 118:1,15,20 119:13 123:6 131:19 134:8 137:16 138:14 able 29:20 75:2,17 95:19 96:1 97:8 102:2 111:5 127:6 abuse 82:16,20 95:8 121:15 access 58:15 59:6,7, 22 60:16 75:12,17, 21 76:8,17 78:17	115:20 116:4,14,21 119:1 actually 41:16 60:4 81:19 99:7 adapt 118:20 add 53:17 added 62:3 addition 129:2 additional 23:6 25:17 28:15 address 26:2 27:4 70:6 78:9 111:10 addressed 26:7 111:3 addresses 85:21 ads 22:3 27:15 106:16 advance 49:22 86:7, 12 102:11 advancement 84:7 advancing 134:17 adverse 94:1,10	

<p>agree 9:7 33:17 75:20 76:18,20 107:22 124:18 agreed 78:16 agreeing 75:3 78:4 agreement 24:14 76:21 79:4 agreements 23:20 24:3,13,17 25:1,5 72:17 ahead 17:11 18:8 20:7,10,18,22 21:20 37:20 47:14 50:17 63:14 64:15 71:7 93:1 105:1 117:14 123:1 128:17 139:7 aimed 21:14 111:12 Airbnb 64:16 algorithm 72:2 algorithmic 86:6 algorithms 68:16,22 69:10,14,21 70:6,8, 22 71:21 72:6 84:21,22 85:8 86:15,16,22,22 87:1,2 98:13,17 120:8,16 Alibaba 64:16 103:6, 9,13,16 104:11,15, 16 Alibabi 104:2,20 alike 87:11 Alldridge 7:4 Allen 12:3 allow 24:15 40:22 52:17 53:12 54:2,4, 19 58:19 75:12 77:1 98:18 allowed 52:21,22 58:14 60:16 98:19 138:16 allowing 76:3 allows 53:16 54:22 alluded 116:20 alone 99:17 along 36:21 95:12 alongside 86:16 already 43:4,8,11 99:15 114:17</p>	<p>116:16 127:22 130:3 131:6,20,22 137:12 also 8:12,13 12:15, 20 13:7 34:12 50:5 76:18,21 81:15 82:13 88:1,15 99:19 alter 10:6 124:20 125:1 Amazon 54:18,21 64:16 ambiguity 47:3 Amendment 26:22 41:14 46:19 48:12 50:2,5 56:16 58:22 81:9 119:20 America 83:7 amount 29:8,9,10,17 30:3 analyses 19:16 93:10 analysis 88:15 analyze 85:17 analyzing 11:6 and/or 134:2,19 136:8 Android 53:15 58:4,6, 6 60:6 animals 95:8 121:15 annual 30:4 Another 27:5 67:3 another's 31:17 answer 9:3 10:1 17:11 20:7,10,18 21:20 23:19 24:6, 19 25:8 54:17 63:14 66:12 68:2 81:22 91:22 95:1 109:8 117:12,15,17 126:9 128:17,22 135:14 136:20 137:2 139:6 answered 43:15,19 59:10 125:16 answering 9:12 25:4 28:20 63:2 answers 136:21 anti-Semitism 124:15 antitrust 13:21 14:7</p>	<p>anyone 49:3 Anything 16:8 78:5 118:7 137:6,19 138:18,20 139:4 anywhere 96:8 apologize 12:17 43:19 59:14,17 app 52:17,21,22 53:4, 8,13,18,22 54:2,5, 6,14,19,22 56:10, 13,15 58:14,16,16 59:17,22,22 60:5,6, 9,9,12,13,17,17 appealing 103:19 104:17 appear 123:5 appearances 13:7 appeared 13:16 appears 32:17 apple 8:4 52:21 53:8 60:8,11,13,15,20 applicability 131:13 applicable 109:19 application 76:14 84:18 applications 53:17, 18 applied 79:17 80:6 83:21 84:3,22 applies 81:2 85:7 apply 27:6 80:20 102:18 110:15,20 applying 84:12 appropriate 80:13 approximate 57:8 112:13 approximately 6:22 10:17 11:15 15:10 50:14 108:7,9 112:5 approximation 96:14 97:9 apps 54:6 Aronov 7:1 around 20:2 article 31:18 articles 13:1,6 19:17 aside 50:19 64:10</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>92:15 ask 9:11 36:9 43:10 59:19 62:21 75:14 81:19,21 88:20 98:5 105:9 126:6 127:17 asked 40:18 43:19 125:16 126:7 asking 34:4 81:22 94:20 112:7 125:20 128:8 134:6 139:1 assertion 134:1 assets 16:3 assigning 19:12 associated 98:7 association 7:5 17:16 33:5,21 88:2, 4 90:6 105:16 assume 10:2 47:9 88:21 assumption 99:14 attached 36:7 attempting 27:6 111:16 124:9 attempts 35:12 85:19 86:17 attend 20:13 attesting 122:5 attorney 8:12,13 88:6 attorneys 99:5,18 138:22 139:2 audience 71:17,20 Austin 6:17 authorized 79:2 available 40:21 53:8 111:8 avenues 31:11 aware 31:2 49:12 50:1 53:12 54:1,10, 18 55:3 56:9 60:8, 11 76:2 80:3 106:1, 7,12,18 110:17 130:8 awareness 31:19 awful 39:3 50:6 95:7 99:22 </p>	<p>back 17:15 37:10 61:14 85:6 93:21 95:16 107:13 123:19 126:18 135:13,16 136:2 bad 86:18 115:20 116:4,14,21 119:1 based 56:5 81:11,12 82:6,7,11 83:12,17, 22 95:5 133:15,17 basis 63:9 88:11 128:3 become 75:8 76:4,11 78:2,5 130:9 becomes 28:12 becoming 11:1,14,20 78:12 befall 115:7 119:12 before 8:8,9 10:18 11:1,14 13:9,12 14:3,16,17,20,22 15:2,12,18,20 16:1, 6,9,19,21,22 17:2 38:5,12 40:8 45:6 48:9 78:12 89:14 122:1 began 112:7,11 begin 112:9 beginning 61:16 107:15 begins 6:13 behalf 34:11 62:22 139:9 being 6:19 11:17 24:21 34:20 56:10 57:17 60:9,12 90:6 95:13 110:7 129:2 believe 15:5 18:10 23:19 47:5 49:21 63:2 64:11 95:17 108:9 130:16 133:16 believes 81:3 Ben 7:10 benefit 34:10 90:6 besides 18:22 21:3 30:18 31:4 best 18:10 42:17 43:1,6,16 46:6 51:4,14 52:20 53:7 </p>	<p>57:2 62:5,17 66:8, 15 68:5,7 77:4 78:8 81:3,16 84:6 93:14 103:17 104:11 109:3,17 110:1 113:12 119:19 120:22 123:5 130:22 139:15 better 19:6 28:7 71:21 72:3 88:12 102:8 between 45:3,9 46:1 51:19 113:6 139:2 Beyond 131:22 132:2 134:3 big 9:2 106:14 bill 99:13 billions 96:9 97:5 108:17 binder 36:2,14 birth 78:2 birthdate 77:21 bit 40:14 58:11 70:4 72:21 85:6 107:19 blocked 56:10,12 blocking 53:4 57:15 blocks 60:8,12 blue 101:15,20 bodies 38:5 books 93:9 both 27:17 67:13 76:15 90:18 113:9 bottom-up 101:3 boy 8:4 brand 41:17 97:21,22 brands 95:11 96:6 breach 16:7 break 9:9,10,13 61:7 107:6 bring 62:22 109:6 bringing 62:15 broad 117:22 broader 125:21 broadly 31:10 117:19 brought 28:17 109:4 browser 55:5 Bryan 50:12,19 51:6, 19 burdens 114:21 </p>
<p>B</p>		

burden's 118:13 business 58:20 87:9, 15 88:16,18,21,22 89:2,7,9,16,18,21 90:3,9,12 91:2,14, 17,19 92:2,3,10,21 93:3 94:8 105:13 131:2 businesses 57:2 63:3 78:20 95:12	Carl 6:14 8:3,7 140:3 cart 104:5 case 30:19 37:18 77:3 128:21 138:8 categories 28:1 category 27:2 110:18 Catholic 12:6 cause 126:4 causing 95:11 CCIAs 32:5 center 103:11 centered 20:1 certain 63:20 76:17 96:18 104:19 118:19 certainly 63:22 challenges 110:15 chance 37:14 change 91:19 98:13 106:22 107:3 120:8, 19 122:20 changes 89:18,19,21 90:12 91:17 92:2,3, 5,9 130:6 132:20 changing 78:7 charged 29:10,15 Chicago 11:22 choice 134:17 choose 82:17 104:19 chosen 31:12 58:19 109:6 Chris 7:11 Chrome-based 58:7 circumvent 117:1 Civil 6:17 clarification 83:9 clarify 18:14 30:1 33:7 65:7,11 72:20 79:1 84:10 86:11 116:3 clear 59:5 71:5 92:13 96:7 105:17 115:12 121:14 124:12 131:17 clients 12:16 88:9 close 136:22 code 70:17,20 71:9 codes 70:12,21 71:3 combination 100:12	come 23:10,13 108:18 comes 65:21 80:7,17, 18 94:1,10 95:20 coming 85:20 comments 55:5,6,18, 19 Commerce 13:18 committee 13:19 13:19 14:4 communicate 47:10 communicated 89:9 91:11 92:5 communication 45:3, 15,19,21 46:1,9,10 47:22 51:20 89:11 communications 45:9 47:9 51:18 117:13 community 72:15 74:17 75:3 76:22 77:1 79:5,15,17 80:21 81:2,14,14 82:6,12,13,15,17 83:21 84:2,12,19 86:7,12 88:8 90:14 90:14,22 91:1 98:19,20 99:5 companies 23:13,15 24:12 company 23:11 130:21 complete 139:9 compliance 79:4 108:18,21 109:14 110:12,21 111:10 comply 71:2 98:7,14 108:14 109:18 110:2 compound 136:22 computer 87:21 120:20 concerns 19:6 62:18 concludes 140:2 conclusion 63:12 128:6,15,19 131:11 133:6,13 134:2,19 135:7 136:9 conclusions 132:2 conditions 74:17 79:10 83:20 conduct 41:18 45:14 conference 44:18
C California 16:21 17:3 17:3,7 18:5, 11,18,19 107:20 108:1 110:5,11,19 called 7:17 53:16 101:15,21 104:5 116:20 calling 94:16 Calls 63:11 128:5,18 came 87:16 125:9 Can 8:1 9:13,21,22 13:5 20:7,10 21:20 24:11 25:10 26:16 27:1 28:3 31:14 33:7 34:8 37:3,20 38:7 40:15 51:8 52:7,14 55:5,13,18 57:2 59:7 63:22 68:14 70:17 71:15 76:8,13 77:10,12 78:8,11 79:20 87:15 88:20 88:20 93:8 96:8 102:6 103:13 104:19 107:6,22 117:6 118:10 126:9,14 128:16,22 130:13 135:13 137:2,20 139:12 cannot 25:3 49:8 59:22 63:19 96:3, 18 97:3,11 133:5 136:12 can't 13:19 capability 58:7 capital 19:11,20 51:9	center 103:11 centered 20:1 certain 63:20 76:17 96:18 104:19 118:19 certainly 63:22 challenges 110:15 chance 37:14 change 91:19 98:13 106:22 107:3 120:8, 19 122:20 changes 89:18,19,21 90:12 91:17 92:2,3, 5,9 130:6 132:20 changing 78:7 charged 29:10,15 Chicago 11:22 choice 134:17 choose 82:17 104:19 chosen 31:12 58:19 109:6 Chris 7:11 Chrome-based 58:7 circumvent 117:1 Civil 6:17 clarification 83:9 clarify 18:14 30:1 33:7 65:7,11 72:20 79:1 84:10 86:11 116:3 clear 59:5 71:5 92:13 96:7 105:17 115:12 121:14 124:12 131:17 clients 12:16 88:9 close 136:22 code 70:17,20 71:9 codes 70:12,21 71:3 combination 100:12	come 23:10,13 108:18 comes 65:21 80:7,17, 18 94:1,10 95:20 coming 85:20 comments 55:5,6,18, 19 Commerce 13:18 committee 13:19 13:19 14:4 communicate 47:10 communicated 89:9 91:11 92:5 communication 45:3, 15,19,21 46:1,9,10 47:22 51:20 89:11 communications 45:9 47:9 51:18 117:13 community 72:15 74:17 75:3 76:22 77:1 79:5,15,17 80:21 81:2,14,14 82:6,12,13,15,17 83:21 84:2,12,19 86:7,12 88:8 90:14 90:14,22 91:1 98:19,20 99:5 companies 23:13,15 24:12 company 23:11 130:21 complete 139:9 compliance 79:4 108:18,21 109:14 110:12,21 111:10 comply 71:2 98:7,14 108:14 109:18 110:2 compound 136:22 computer 87:21 120:20 concerns 19:6 62:18 concludes 140:2 conclusion 63:12 128:6,15,19 131:11 133:6,13 134:2,19 135:7 136:9 conclusions 132:2 conditions 74:17 79:10 83:20 conduct 41:18 45:14 conference 44:18

confidence 25:4 confidential 24:18 confidentiality 23:20 24:2 conflict 26:21 conform 54:7 conforms 56:15 Congress 13:8,10 connected 58:5 consequences 19:7 considerable 19:4 considered 33:13 Constitution 59:1 constitutional 26:21 27:14 consulted 113:18,21 Consumer 18:12,19 107:20 108:1 contact 92:9 contain 119:5 contained 116:4 121:7 127:22 129:17 131:6 137:7 contains 61:21 contend 63:6 124:20 contends 115:6 content 19:14 27:16 31:17 32:5 32:5,13, 15 35:20 39:3 44:12,20 46:18 50:6 52:15 66:4,7, 13,14,17,18 67:7, 11,13,14,15,17,20, 22 68:4,6,13,17,18, 19 69:2,7,11,18 70:7,13 71:1,12 72:3,4,7,11,16 73:2,6,11,14,18 79:10 80:2,7,9,13, 17,19,22 81:1,4,12, 12,13,15 82:2,3,4, 5,6,7,11,11,14,18 95:7,14 97:17 98:18 99:22 100:9, 13,19 101:1,2,3,4, 8,12 102:9,22 103:12 104:7,10 105:18 112:19 115:20 116:1 117:1, 20 118:5,14,15,19	119:7 120:9,14,15, 19 121:5,10,14 122:3,7,8,12,17 123:4,9,13,22 124:4,6,13,21 125:2,18,22 126:2, 7,12,21 127:7,8,13, 21 129:3,7,9,10 130:1,4,9 131:5,20 132:7,10,19 133:4, 10,18 134:9,16,22 135:6 136:7,13,18 137:15 139:3 context 31:4 35:19 continue 89:16,17 continued 88:1,6 contract 77:5,19 contractors 86:7 contributes 106:7 conversations 11:8 44:1,8,10 62:8,13 109:9 copies 19:17 45:5 co-plaintiff 30:9,11 co-plaintiffs 30:13, 20,22 copy 37:16 Cor 89:5 Corbello 7:9 core 21:10 26:13 correct 8:12 18:20, 21 30:8,17 33:11 37:16 62:1 65:10 66:1 101:22 113:13, 17 117:21,22 120:12 cost 95:21 96:4,14 97:2,9 98:4,7 99:10 costs 96:5 98:10 108:21 110:14 119:11 could 36:18,21 41:3 42:18 47:6 97:4 99:6 135:16,19 couldn't 43:20 counsel 7:6 10:12 11:2,4,13,17,20 12:11 20:20 109:10 113:2 113:2,9,10	117:13,16 country 20:13 coupled 78:9 course 112:20 Court 6:16 7:4,13 9:1,7 16:15 36:20 37:21 81:19 135:12 Courtney 7:9 courtroom 8:21 Court's 24:9 courts 38:5 cover 119:10 covered 20:6 24:8,10 40:6 63:17,21 64:2, 21 96:19 97:13,15 create 86:18 91:7 92:16,17 121:10 created 72:1 81:11 85:9 90:19 91:2,8, 10 100:9 creating 79:8 85:1 88:7 93:22 94:10 creation 19:14 69:20 85:18 114:8,12 criminal 85:19 criminals 85:21 current 10:9,10 12:10 62:2 88:20, 22 89:7,8 currently 16:14 30:10,11,19 35:19, 22 52:17 53:4 54:2, 18 56:9 59:8,22 60:8 84:14 89:4 98:19 109:13 111:11 116:5 120:16 122:16 129:17 136:15 customers 41:15 103:18 130:8
		D
		damage 97:22 data 16:7 70:21 71:12,16,18,22 72:1,5 92:15 date 78:2 112:13 deactivated 93:11,16 decade 88:10

decades 87:19	134:4	115:21 118:8 120:1
decide 57:2 80:13	de-prioritization	discounts 29:21
103:17	81:11	discretion 27:16
decision 84:5	describe 87:15	39:1 41:13 44:12,
decisions 69:2 88:14	described 18:3 23:16	20 46:18 48:11
124:3 132:10	55:21 99:9 102:18	50:4 54:6 56:14
134:16 135:6 136:7	103:6 127:14 129:3	58:19 62:20 66:7
137:15	describing 70:18	69:3,19 75:4 77:2
declaration 20:6	descriptions 117:22	80:12 81:5,8 83:15
24:8,10,19 25:2	118:18	84:4 88:17 91:3
36:19 37:17 40:4,6,	desperately 81:18	98:21 102:11
10 55:13 89:6	detailed 118:18	103:14,17 117:2
111:3 112:6,10,11,	determine 92:20	118:3,21 119:18
21,22 113:5,7,8,14,	detrimental 41:16	120:22 125:8
19,21 114:8,12,18,	developed 87:19	137:16 138:15
20 115:1,4,5,10,12,	development 12:18	discriminating
16 116:5,8,10,16,	69:20	84:11
21 117:5,10,19	device 58:5	discriminatory 27:6
119:5 120:7 121:7,	devices 58:5,6 59:12	84:18
12 122:4,10 127:10,	75:1	discuss 19:8 44:5,19
19 128:1,9 129:17,	diagrams 73:6,14	73:17 117:5 139:3
21 130:2,6 131:7,	Dickson 12:4	discussed 64:13
15 132:4,5,8,15,17	dictate 103:14 104:6,	113:16 118:7
134:3 137:8,21	10,14	123:18 127:9
138:5,10,11,19	die 16:3	131:21,22 134:10
139:5,8,12,17	different 9:11 28:1	discusses 114:20
Defendant 7:10	40:14 53:21 66:19,	115:1 117:19 132:8
defendants 6:14	21 67:3,12,22 68:1,	discussing 11:9
Defense 36:4 37:16	9 76:1 78:20 80:16	discussion 83:19
112:6,10,21 137:21	83:17 84:4 96:4	112:2 120:7
Define 78:19 97:3	100:22 101:1	discussions 112:19
definition 55:15,17	118:11 120:5	138:21 139:1
56:5 63:15 64:5,7,	136:21	Disher 7:7
9,12,21 77:10	differentiation	dispute 25:12
96:19 130:13	55:9	District 6:16,17
definitions 131:12	differently 72:4	diversity 103:4
DelBianco 51:6,16,19	83:6,12,16,21 84:3,	Division 6:17 99:21
demand 131:13	13 110:5,19	130:7,12,14,21
demographic 21:15	digital 16:3 27:6,15	131:2
demote 81:7	106:15,21	document 32:2,3
denial 95:9 121:16	direct 97:12	37:15 74:6
denied 59:6	directed 23:7	documentation 72:11
deniers 116:22	direction 22:8	73:1
deny 60:16	directly 10:1 20:2,	documents 24:22 35:5
depend 100:16,18,19	13 46:7 48:19	39:22 40:13,15
128:11	49:10 89:16	41:3 90:18 111:5
deposition 6:13,19	disclose 24:7,11	113:18,20 114:4,5,
8:7,9,19 24:9,22	109:9 133:19	6,10,11,13,16
25:3 36:6 40:5	discloses 117:12	does 11:5 17:17,20
111:2 131:15 132:3	disclosure 25:5 72:8	21:4 22:11,18

<p>23:10 25:21 28:8 31:3,22 32:4,18,20 33:2 42:22 46:5 53:12 54:1,4,10,18 63:6 71:5 76:11 77:7,13 78:17 80:20 81:10 82:8 84:21 86:2 90:4,7 91:12 92:19 96:7 97:20 99:17,19 102:22 102:22 106:20 107:3 111:15,17 115:5 119:5,10 123:4,5 130:11 doesn't 35:11 doing 81:6 84:15 133:22 dollar 29:17 30:3 dollars 30:4 96:9 97:4,18 108:17 123:3 donations 22:5,8 done 36:22 38:8 51:20 down 25:14 58:10 download 52:18 58:20 downloadable 58:16 60:9,12 draft 112:5 drafted 39:20 drafting 112:7,9,11, 14,20,22 113:5,6, 19,21 114:18 draw 134:19 drawing 132:2 drive 9:5,7 due 47:6 48:10 63:15 83:14,18 96:9,17, 19 97:19 110:14 115:21 132:20 133:11 135:5 dues 22:16,19 23:2 29:3,4,6,9,11,16, 18,21 30:4 33:10, 12,17 duly 7:18 during 14:11 48:21 112:20,22 duties 12:12,14 13:3,</p>	<p>4</p> <p>E</p> <p>each 9:4 13:15 35:18, 20 75:7 76:2 91:1 94:13,21 95:19,21 96:4,5,12 97:8,11 99:13 100:19 102:20 108:12 111:9 114:3 121:5 earlier 62:7 64:13 early 112:16 ease 36:3,20 easily 32:16 eBay 64:17 ecosystem 14:6 87:20 105:21 editorial 26:20 27:16 38:20 39:1, 12,19 40:7,13,19 41:6,13,18 44:12, 20 45:14 46:18 48:11 50:4 54:5 56:14 58:18,21 62:20 66:7 69:3,19 75:4 77:2 80:12 81:4,5,8 83:15,18 84:4 88:17 91:3 98:20 102:11 103:16 117:2 118:2, 21 119:2,18 120:21 124:2 125:8 134:17 137:16 138:15 editorials 39:16 education 18:1,4 19:1 effect 62:19 94:14, 22 95:4 98:14 100:5,8 108:5,6,8, 11 110:7 114:22 115:3,7,13 116:18 124:8 125:10 126:13 128:6 138:16 effective 34:18 effects 128:10 137:8 effectuated 88:13 effort 69:3 efforts 56:13 87:20</p>	<p>eight 10:17 either 13:18 32:5 34:9 50:21 51:11 72:3 78:8 92:16 134:7 135:7 Electronic 88:2 else 16:8 42:16 45:20 78:4 113:3, 10 email 45:20,21,22 47:8 78:8 emails 46:4 employee 51:5,15 employees 11:7 19:12 20:12 47:19 49:13, 22 50:15,21 51:10 68:22 86:6 empower 118:22 enable 26:11 enables 26:2 53:17 enabling 116:21 enacted 19:8 enactment 40:8 encompasses 130:16 end 61:11 107:10 Energy 13:18 enforce 69:1 enforcement 14:7 66:19,20 67:21 68:1 engage 17:6 18:4 19:14 20:11,13 26:12 27:15 41:13, 18 44:12,20 45:2 46:17 47:21 48:11 50:3 51:5 56:14 58:21 62:20 66:6, 14 67:13,15 68:6 69:1 77:2 82:10,14 85:19 99:4 101:2,3 103:16 115:22 118:18 121:11 124:4 130:17 132:1, 7,16,19,19 134:2, 18 137:16 138:15 engaged 11:11 18:9 35:19 38:19 44:4,7, 17 46:5 engagement 17:22 67:7</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

engagements 11:12 engages 19:2 34:16 131:2 engaging 20:2 45:14 88:2,11 engine 32:17 enough 9:6,14 58:10 ensure 25:4 85:18 123:3 entail 11:5 entails 11:6 enter 72:18 77:5 enterprise 12:22 13:5 17:19 21:12 22:22 23:8 25:19, 22 26:4,14 33:18 entire 105:13 entirety 127:19,22 entities 24:12 entry 86:14 epithets 124:14 equally 79:17,21 80:21 essentially 101:21 105:8 118:13 estimated 98:4,6,10 99:13 106:15 Etsy 64:17 even 49:12 133:16 events 20:14 26:12 ever 8:7 14:20 93:11 every 9:10 55:4 62:17 75:19 80:6 114:9 130:11,22 131:1 everything 102:14 exact 15:13 29:8 66:13 68:4 96:3 exactly 11:15 15:8 21:7 57:6 example 26:17,19 27:1,5 28:13 31:17 32:2 76:10 83:17 98:3 101:14 115:19 116:6,9 120:6 125:11,13,19,22 126:19,20 129:16 examples 90:17 103:7 133:10 except 50:12	exceptionally 101:4 exclusively 27:7 69:6,9 Exhibit 36:4,6,19 37:16 112:6,10,12, 21 113:1 137:21 138:2 existence 24:16 52:13 138:9 existing 98:19 expect 9:21 Expedia 64:17 expend 123:2 expended 19:21 expenses 108:18 experience 52:7 97:16 explain 68:14 79:20 125:7 explains 132:17 explicitly 116:10 exposed 57:17 exposés 93:9 express 62:15 68:8 118:2 119:13 138:15 expressing 18:17 expression 12:21 13:5 17:18 21:11 22:22 23:7 25:18, 22 26:3,14 33:18 58:21 expressly 76:18 129:20 extensive 91:18 extent 24:7,11,16 29:19 109:8 117:12 128:16,18,21 external 73:14 extrapolates 91:17	10,13 82:1,10,17 83:3,5,11,15 84:5, 11,21 85:1,7,17 86:2,5,6,7,8,14,18 87:1,2 88:9 97:15 101:14,16 102:2,6, 10,14,17 103:2 106:1,14 Facebook's 78:18,19 83:13,18,20 84:2,7, 19 faced 116:12 125:9 fact 106:20 128:22 facts 40:17 41:1 factual 128:21 Failure 77:18 Fair 9:6,14 10:2 57:15,20 58:10,12, 14 114:22 122:9 133:15 Fairness 27:8 fall 27:2 64:11 110:17,20 familiar 52:11,13 67:10 87:9 88:22 89:2 familiarity 87:14,16, 18 fault 27:9 federal 16:14 Federation 105:5,8, 15 106:2,8,13 feed 101:22 102:3,4 103:6 feeds 102:12 Feel 36:11 52:1 few 13:1 figure 96:14 97:20 filed 6:16 18:11 38:21 filings 138:12 139:9 financial 95:12 96:7 financially 43:7 106:8 find 41:15 fine 28:3 37:5 49:19 finish 9:3,11 firm 7:1 11:22 12:2, 3 first 7:18 26:22
	F	

38:1 41:14 46:19 48:12 50:2,5 54:11 56:16 58:22 61:7 77:14 78:3 81:9 87:8 110:18 119:20 130:15 firsthand 84:17 fit 41:19 Florida 15:19,20 16:1,6,9,11,19 30:15 31:4 Fluid 64:17 flying 20:12 focus 81:21 focused 40:5 follow 36:21 follows 7:18 forced 95:6 122:2,11 124:6,13 125:17 129:2 forcing 118:17 129:8 foreign 83:6 Form 17:9 19:11 21:8, 18 22:13,18 23:3, 17 24:4 25:15 26:8 27:12 28:18 31:6 32:7 33:6,15 34:2 35:7,13 38:10 39:9 40:20 44:3,16 45:2, 11,18,21 46:3 47:13,20 48:5,17 51:2 52:19 53:6,14 54:3,12,20 55:8 56:1,11,21 57:10, 19 58:17 59:9 60:2, 10,18 63:1,8 64:14 66:5 67:5 68:20 69:16 70:15 71:6, 14 72:13 73:8 75:9 79:19 80:10 82:9 83:1,4 84:1,16 85:2,11 86:4 87:17 89:13 90:10,21 91:15 92:7,22 93:8 94:15 95:3 96:2,16 97:10 98:8,15 99:11 100:21 101:10 103:3 104:8 106:3,17 107:2 108:16 109:16	110:8 112:1 115:17 118:9,16 119:9 120:2 121:8 122:18 123:11 125:12 127:11 128:2 131:8 133:8,21 134:13 135:3,15 136:3,19 137:10,22 138:6 139:14 formed 138:12 forms 95:9 four 11:16 81:20 frame 14:12 fraud 85:19 fraudulent 86:19 free 12:21,22 13:5 13:5 17:18,19 21:11 21:11 22:22 22:22 23:7 23:7 25:18 25:18,22,22 26:3 26:3,13,14 33:18 33:18 36:11 52:1 from 7:1 19:15 22:19, 20 23:10,13 45:14 49:12 50:19 53:4 56:10 57:15 58:22 60:9,12,12 62:3 67:3 85:20 92:15 93:12 96:8 97:16, 21 105:14 115:20 118:11 119:22 139:11 front 13:8 14:15 15:18 fully 138:12 function 55:21 56:3 78:22 functions 55:20 fund 28:16 43:4,7 111:15,17 funding 22:11 25:17, 21 26:11 funds 106:1 further 133:10 future 91:20 96:9 97:22 98:1	Gab 52:8 55:2,3,4,7, 14 56:7,9,12,20 57:15,16,17 58:8, 13,15,19 59:6,7,22 60:5,9,16 Gab's 60:12 gain 76:8 78:17 79:3, 8 gaining 86:14 97:22 gave 56:6 64:4 65:9 90:17 129:16 Gene 7:1 general 10:12 11:2 12:10 generally 52:12 55:3 generated 68:18 80:20 81:1 generating 80:9 82:5 get 68:12 83:21 111:14,16 122:15 125:15 gets 100:19 getting 111:12 123:19 give 26:17 27:1 37:3 77:10 96:3 97:8,11 120:6 130:13 given 8:19 25:1 26:22 43:16 45:6 47:3 48:12 50:4 115:8 140:2 giving 64:7 116:6 global 105:16 goal 83:14 goals 19:2,22 20:1 34:11 God 59:18 goes 82:1 100:10 115:2,7,13 116:17 going 36:3 37:6 47:1 59:2 61:9 62:19 92:12 97:7,9 102:13 103:20 107:8 121:18 124:20 125:1 126:1 128:6 133:19 135:1 136:22 137:3 Good 6:12 7:22 52:3 61:6 61:6 139:21 Google 52:22 53:4,12
		G

<p>54:1,4,14 56:10,13, 19 57:5,7,9,14,17 58:19 59:6,11,12 60:4 64:2,18 97:15 106:7,14 Google's 56:13 58:12 59:8,21,22 government 14:7 38:6 granted 81:20 greater 116:11 group 43:2,8 groups 42:7,11,14,20 43:3 111:15,17 guarantee 49:9 guaranteed 41:13 81:8 119:20 guess 27:22 55:12 71:20 78:21 guidelines 69:18 72:15 74:17 75:3 76:22 77:1 79:6,15, 17 81:2,14 82:7,13, 15,17,20 83:21 84:3,13,19 86:8,12 88:8 90:15 98:20 99:5</p>	<p>harms 115:2,6,12,15 116:15,19 117:4,9 119:11,12,22 Harrold 12:3 Has 30:22 34:7,22 57:5,7,9 58:19 59:6 75:20 78:12 79:11 80:3 85:9 87:1,2 93:11,15 98:6,10 100:3,6 109:4 131:1 137:12 138:12 hasn't 128:8 hate 95:7 hate-speech 116:22 haven't 43:11 having 7:17 11:8 63:22 98:7 125:21 129:18 HB20 38:8,13,16,20, 22 39:13 41:6,8,22 42:7,8,14,21,21 43:2,4,5,8,9,12,22 44:5,11,19 45:4,7, 10,13 46:14,17,22 47:6,11 48:3,9,16, 21 49:5,8,10,14 50:1 51:1,6,12 62:8,14,18 63:7,16, 21 64:3,9 93:22 94:14,22 95:4 96:18 97:13 98:7, 14 100:4,7 105:19 114:22 115:2,7,13 116:17 117:21 118:1,5 119:6 120:10,13,18 121:3, 9 122:21 123:9,12, 20 124:2,8,12 125:9 126:4,11,22 127:8,20 128:6,10, 12 129:22 131:5,12, 19 132:6,9,11,20 133:3,12,17 134:8, 22 135:7 136:12,17 137:8 138:16 HB20's 122:6 124:20, 22 126:1 head 13:20 14:10 39:18 41:4 42:3</p>	<p>heard 50:22 hearing 79:7 hearsay 49:17 held 6:19 help 35:6 39:22 40:17 helpful 74:12 here 38:4 55:12 62:9, 16 63:5,17 68:10 74:8 76:5 96:12 115:14 122:15 128:19 131:17 134:21 136:15 137:6,19 139:12 he's 128:19 hide 104:19 higher 32:17 hire 69:1 99:3 100:4, 7 holocaust 95:9 116:22 121:16 HomeAway 64:18 horrible 95:14 host 34:20 95:6,14 122:2,8,11,16 123:13 124:6,13 125:18,21 129:3,8 hosted 105:18 hour 9:10 99:14,15 hours 81:20 99:16 House 13:12,14,17 however 14:11 29:21 40:14 96:5 110:13 115:11 130:15 138:11 Hughes 50:12,19 51:6, 19 Huh 135:21 Hulu 21:5 human 19:11,20 85:8 86:3,9,17 99:4 100:12,13 120:20 129:6,19 humans 69:7 hundreds 96:8 97:4, 18</p>
		<p>I</p> <p>ideas 31:14</p>

identification 36:7 identified 116:16 identify 19:6 19:6 40:16 91:19 102:8 104:16 111:5,7,9 134:14 identities 24:12 I'll 24:19 36:9 85:6 92:13 117:11 134:6 illegitimacy 85:14 Illinois 12:1 illustrative 125:4 I'm 7:2 8:10 9:17 20:22 27:22 30:7 31:2 36:3 38:21 47:1 52:13 55:12 59:2 71:3 72:21 78:21 79:7 80:18 81:21 89:2 90:18 92:12 94:20 95:16 97:5 102:13 103:20 121:18 122:15 125:6,15,20 128:8 137:3 139:1 immediate 78:17 96:10 immediately 85:9 108:12 impact 11:10 19:8 41:12,15 44:5,11, 19 46:7,17 47:4 48:10 62:19 88:17 89:15 97:12 118:1, 5 119:6 121:4 121:4 126:1,21 127:8,20 130:1 132:6 133:18 136:17 137:13 impacted 47:6 89:19 127:6,13 130:5 132:9,11 136:6 impacts 94:1,10 118:7,14 126:11 131:19 133:3 136:13 impede 118:20 impedes 50:3 impending 11:9 99:22 implement 99:19 inability 115:20	116:3,14 include 12:14 13:6 76:21 79:14 88:9 96:5 97:15,20 99:17,20 115:11 120:20 130:6 134:16 138:19 139:5 included 115:10,16 121:12,16 132:4 138:2,5,10,20 139:17 includes 79:5 88:15 109:21 including 59:12 90:13 95:7 122:12 123:14 124:14 125:5 129:9 income 22:12 increased 26:3,7,16, 18,19 27:10,21 28:3,6,11,13 incurred 115:19 independent 90:7 91:12 individual 23:11 24:12 83:16 individually 48:15, 20 49:5 individuals 18:1 20:2 113:4 inform 70:22 90:3 92:9 information 24:7 49:13 70:10 77:7, 11 78:11,15 90:19 91:10 92:15,19 105:11 111:2,3,6,7 138:1,4,7 informed 89:20 infrastructure 99:18 in-house 113:1,9 initial 87:20 initiate 44:10 initiated 44:1,8 injunction 37:18 insane 9:5,8 insomuch 90:8 123:21 instead 36:21 37:21	40:5 instruct 24:6,19 109:7 117:11 instruction 25:8 integrate 99:20 Integrity 7:2,5 intended 65:4 intent 83:19 interact 68:17 70:7 129:18 interacts 72:2 interested 19:18 interesting 31:18 interests 66:9 internal 73:10 internet 12:22 17:19 21:12 26:4 27:8 39:3 50:6 87:19 interpret 31:14 interpreting 88:8 128:11 intimate 87:14 intimately 87:9 88:21 89:2 into 27:2 33:20,21 62:19 68:12 72:18 77:6 94:14,22 95:4 98:14 100:4,7 108:18 110:17,20 114:22 115:2,7,13 116:17 124:8 125:10 137:2 introduce 7:6 investigates 92:18 investigation 90:8 91:13 92:20 investigative 93:9 involved 89:10 108:3 111:11,13 involves 12:15,19,20 103:12 irrelevant 138:9 irreparable 95:11,20, 22 96:6 97:21 115:1,6,12,15,18 116:7,9,11,15,19 117:4,9 119:11,22 121:10 126:5,6 132:17,18 133:10 137:14 138:14
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

irreparably 94:6,8, 13,22 95:20 134:15 135:5 136:6 issue 13:20 14:5 16:2,7,16 issues 9:18 12:20,21 14:6 15:5 16:18 19:13 40:6 46:6 89:15 112:2 113:15 it'll 100:18 it's 9:19 14:12 31:13 53:21 60:5, 15 66:2 72:3,5,7 73:20 74:3 78:7 118:13 136:21 139:2 its 11:10 19:2 32:4 33:3 34:11 34:11 43:22 44:2,4,8,11, 18 45:3,9 46:2,5,6, 13,17 47:4,9,10,19 48:10 53:4,13 54:2, 5,5,6,7,19,22 56:14,15 57:15 58:18,20,22 59:7 60:9,16,17 64:9 68:19 73:1 76:4 77:1,4,4 78:22 80:11,12,13,14,20, 21 81:2,3,4,4,7 82:2,3,4,6 83:11, 14,14 84:5,6,6,12, 12,21 90:12 92:1 95:10 95:10 102:10, 11,19,21 103:16,17 115:7 123:5 128:7 130:7 131:2,12,12 136:17 137:8 itself 24:15,17 81:12 82:7 138:11 I've 9:12 10:3 13:12 15:20 36:2 40:18 92:13	joining 89:14 journey 89:17 Judiciary 13:19 14:4 jump 135:19 June 108:9 just 8:15 15:16 18:3, 14 23:16 25:6,12 28:6 30:1 32:15 35:20 36:9,18,22 39:12,19 41:6 46:10 49:2 52:1,11 55:20 56:6 65:6 65:6,8 70:5 78:15 84:10 86:11 90:17 96:15 97:2 98:12 99:9 99:9 102:18 103:1 105:1 108:11 116:3 117:9 123:18 129:16 131:17 133:2	76:6,7 78:8,14 84:14,18 91:18 93:15 94:12,20 109:3,18 110:2 113:12,15 114:15, 19 128:21 130:22 139:16 known 82:16 85:20 86:18
		L
	labor 99:4 lack 28:7 71:21 landscape 89:20 92:3 large 21:15 last 51:8 77:14 78:3 93:21 124:11 125:3 126:20 127:15,17 129:3,14 136:1 law 11:22 12:2,3,5,6 14:7 16:10,12 18:17 19:16 27:13 28:12 40:8 50:2 62:19 108:14 110:10,12 128:12 lawful 39:2 50:5 95:7 lawmaker 49:10 lawmakers 17:22 18:2 48:20 49:22 50:9, 12,15,19 laws 109:19 lawsuit 30:9 31:4,5 62:15,22 lawsuits 35:19 lawyer 128:19 lead 39:2 leading 105:16 learning 19:19 least 50:22 64:1 left 36:2 137:20 138:18 139:4 Legal 7:2 7:2,5 11:10,11 12:15 17:22 19:16 63:11 89:19 108:18,21 109:9 110:14 128:5, 15,18,20 131:11 132:2 133:6,13	
J		
James 65:22 job 10:9,10 11:5 11:5,6,18 12:10,12, 14 13:3,4	joining 89:14 journey 89:17 Judiciary 13:19 14:4 jump 135:19 June 108:9 just 8:15 15:16 18:3, 14 23:16 25:6,12 28:6 30:1 32:15 35:20 36:9,18,22 39:12,19 41:6 46:10 49:2 52:1,11 55:20 56:6 65:6 65:6,8 70:5 78:15 84:10 86:11 90:17 96:15 97:2 98:12 99:9 99:9 102:18 103:1 105:1 108:11 116:3 117:9 123:18 129:16 131:17 133:2	

<p>134:2,19 135:7 136:9 138:12 legislation 11:6,9 16:7 19:5,7,8 26:20 28:10,12 41:12 47:3 legislative 15:15 17:8 38:5,9,17 39:14 41:9 42:1,8 43:13 46:15 48:4 legislator 49:14 51:16 legislators 48:3,8, 15 49:4,8 51:1,12 legislature 14:21 15:1,19,21 16:2,7, 10,19,22 17:3 38:13 45:7 48:8,9 legislatures 14:14, 16,18 legitimacy 85:13,18 length 90:15 less 52:7 81:20 lessening 56:19 let 36:22 38:2 43:10 47:2 52:1 58:10 60:4 61:5 73:22 76:19 87:4 105:1,9 120:6 Let's 13:11 14:19 51:22 61:3 76:10 98:3 99:14 102:18 104:22 112:8 121:4 level 15:15 like 8:14 21:2 34:8 36:12,20 52:8 55:4, 13 85:19 90:13 103:14 113:7 120:16 137:1 likely 99:7 104:12, 17 Likewise 63:18 102:7 105:20 Lime 64:18 limit 58:10 limited 101:4 122:12 123:14 124:14 125:5 129:9 132:3 link 32:3 list 47:1 61:21 62:2,</p>	<p>4,5,9,12 63:5 65:3, 5,8 76:5 95:17 121:14,17 122:1,13 123:16 125:4,6,20 listed 63:16 64:11 67:16,19 68:3,6,10 96:13 121:17 123:4 125:7 126:12,19 litigation 28:16 30:12,14,15,18 31:1 109:1,4 little 25:12 40:14 53:21 58:11 64:4 70:4 72:21 75:22 80:16 85:6 107:19 120:5 lobbying 17:6,13 located 6:20 log 103:15 104:3 logs 103:9 long 10:14,16 11:13 long-term 93:22 94:10 look 36:9,11 37:15 52:1 61:4 120:16 looked 40:4 looking 52:7 54:16 99:15,16 111:20 looks 103:14 113:7 lose 119:13 138:14 loss 98:5 99:8 115:19 116:3,13 125:8 losses 95:12 lost 85:3 96:9,10 97:18,19,21 lot 42:18 lots 138:7 Lyft 64:18 Lyles 7:10</p>	<p>71:5 82:8 88:14 102:10,15 115:8 130:8 133:22 134:2 makes 105:17 making 124:12 managing 12:14 mandated 115:21 manner 67:14 121:11 many 13:22 14:17 46:4,16 47:4 50:14 57:5,6 59:11 63:16 68:21 78:20 95:9 103:5 105:13,21 Marchese 7:11 marked 36:4,6,18 37:15 112:6 market 29:12,14,15 106:14 match 119:2 matter 6:14 12:20 30:8 128:12,22 may 29:19 40:12 51:11 63:17 63:17 67:19,21 75:1 79:3 81:6 82:17 91:19 109:8 110:13 117:21 maybe 32:16 42:15 68:8 72:20 85:6 92:14 120:6,8 137:2 mean 17:12 18:19 31:7,10,22 32:9 44:8 54:10 65:2 68:14 70:20 72:1 74:21 93:6,16 108:1 means 74:22 129:1 meant 30:5 59:17 65:22 105:7 138:19 139:5 measures 38:15 mechanisms 67:21 68:1 media 13:7 16:10,12 31:19,21 32:13 52:8,14 55:7,10,13, 16,17,22 56:3,6,7 61:11,16 63:16 64:5,8,10,12,22</p>
M		

<p>78:22 88:3 96:20 107:10,15 medications 10:5 meet 19:2,5,21 49:22 meeting 12:16 12:16, 17 meetings 20:13 44:14, 18 89:10 member 60:20 62:17 75:19 76:3 77:7,13 78:17 91:1 93:11, 20 96:4,5,18 97:7 97:7 105:19 109:4 111:9 115:21 131:1 member-created 92:19 members 11:9 12:17 12:17,21 22:21 23:21 24:2 26:21 27:14,18 28:21 29:5,7,8,10,12,14, 18,19,22 32:4,10, 14 33:3,4,10,12,13, 16,22 34:10,11,13, 19,21 35:1 39:2 41:11 43:22 44:2,5, 9,11,18 45:3,5,9, 13,22 46:2,5,6,14, 16,21 47:1,4,5,9, 10,19,22 48:10 50:3 52:16 61:22 62:3,8,9,11,12,14, 15,21 63:6,16,20 64:11 66:3,6,12,14 67:2,3,10,16,19 68:3,5,10,16,21 69:6,9,13,17 70:8, 12 71:1,11 72:10, 14,22 73:5,9,13,16 74:15 75:7,11,16, 17,18 76:5,8,8 77:16 87:10,15 88:12 89:1,3,8,15, 17,20 90:2,4,5,8, 13,19 91:7,9,11,11, 13,17 92:2,8,16,21 93:4 94:2,8,11,13, 21 95:6,17,19 96:13 97:14 101:7 102:19,21 103:5</p>	<p>105:13,21 106:21 108:13,19 109:5,13, 18 110:2,4,11,13, 17,19 111:21 112:3 114:21 115:2,7,12, 22 116:12,17 117:3, 20 118:2,5,18,22 119:3,6,12 120:10, 14,18 121:6,11 122:2,7,11,16 123:2,10,13,21 124:3,5,12,21 125:1,9,17 126:2,5, 13 127:3,5,8,13,21 129:4,5 130:1,4,10, 11,17,20 131:1,5, 19 132:6,9,10,16, 18 133:3,11,18 134:8,15,22 135:5 136:5,13,17 137:9, 14 138:13 member's 76:2 97:8, 12 100:10 membership 12:18 22:16,19 23:2 29:3, 4,6,9,11,16,18,20, 21 33:4,20 34:9 93:12 103:5 mens 137:1 mention 65:2,4 74:15 mentioned 15:16 46:10 55:2 91:6 met 73:16,17 methods 66:19,20 might 9:19 24:13 27:9 42:13 44:5 65:6 84:11 103:19 109:8 120:8 million 57:12,16 58:13 59:7,21 63:19 96:20 97:5 99:16 millions 96:9 97:18 123:3 mind 37:2 52:1 missed 65:6 missing 119:22 139:11 mission 22:22 25:18 33:17</p>	<p>mistaken 90:18 mixture 86:5 model 89:21 92:2 105:14 models 87:9,15 88:16, 21,22 89:3,7,9,18 90:3,9 91:14,18,19 92:10,21 93:4 94:9 moderate 66:3,13 68:12,18 71:2 72:4, 5 101:8,12 102:3, 22 118:15 120:9 122:7 124:21 125:2 127:7 131:20 133:4 134:9 moderated 52:7 100:19 moderating 72:7 82:3, 6 moderation 66:7,15, 17,18 67:7,11,13, 14,15,18,20,22 68:4,7 69:2,18 70:13 71:13 72:12, 16 73:2,7,11,15,18 80:2 82:4,11,14 101:1,2,3,5 116:1 117:2,20 118:6,19 119:7 120:14,16,19 121:5,10 123:22 124:4 126:2,7,21 127:9,14,21 129:7 130:1,5 131:5 132:7,10,20 133:11, 18 134:16 135:1,6 136:7,13,18 137:15 modification 126:7 modifies 123:20 124:2 modify 104:6 108:13 120:15 moment 36:5 120:1 133:2 money 22:3 mongers 116:22 monthly 63:19 months 10:17 Moody 16:14 30:14,18 more 19:19 25:10 32:16 42:22 57:11</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>70:4 71:5,15 81:19 83:10 88:10 92:14 106:15 121:15 134:7,21 136:15,16 most 34:18 81:17 88:11 103:19 104:12,17 motion 37:18 88:4 moving 28:11 much 9:4 20:1 37:3 81:21 99:10 106:21 121:15 138:1,4 must 63:18 76:18 mutilation 95:8 myriad 11:12 76:13 119:11 myself 138:21 139:9</p>	<p>20 33:14,22 34:1, 10,12,16,17,21,22 35:11,18,22 38:9, 12,16,19,21,22 39:1,7 41:8,21 42:6,14,20 43:1,3, 6,12,22 44:2,4,8, 10,17 45:2,5,9,12, 13 46:1,5,5,13,16 47:4,5,10,18 48:3, 7,14,19 49:3,4,9, 13,21 51:15 60:21 62:11,21 63:6 68:22 69:15,17 70:9,11,14 71:9,13 72:11,14,15 73:3,7, 9,15,16,17 74:15 75:11,19 76:7 84:22 87:1,3 88:10, 11 89:9,12,14,17 90:4,7,11 91:1,9, 12,12,16 92:1,6,8, 9,17,18,19 93:2,4, 11,12,15 95:6 100:3,6,10 103:5 103:5 105:13,21 108:3,19 109:3,18 110:2,11,13 111:9, 11,13,15,17 113:1, 2,9,10 114:2,7 115:6,22 116:12 117:3 118:1,17,22 119:3,12 120:18 121:11 122:2,10,16 123:2,12 124:3,5, 12 125:9 126:5,13 127:3,8,13,21 129:4,5 130:9,11, 17,20 131:1 131:1 132:16,18 133:11 134:15 135:5 136:5 137:14 138:12,13 139:9 NetChoice's 19:21 32:5 33:2,4,10,12, 16,21 46:21 52:16 56:18 57:1 60:15 61:22 70:8 71:11 72:10,22 73:5,13 75:7 89:8 90:2</p>	<p>92:16 94:1,13 101:7 102:21 108:13 110:4 111:21 116:17 118:5 119:6 121:6 123:8,21 125:17 126:2 127:5 128:20 131:19 133:3,18 137:9 never 93:15 new 86:18 99:5,6 118:20 129:7 news 101:22 102:3,4, 12 103:6 newspaper 40:22 next 55:2 Nextdoor 64:18 non-disclosure 24:13,14,17 25:1 non-exclusive 121:13,17 non-responsive 59:3 70:2 102:14 103:21 121:19 132:22 135:10 137:4 nor 96:20 Northwest 6:20 nothing 56:19 137:11 139:11,16,19 noticed 13:1 November 6:21 now 8:21 16:14 37:14 86:21 99:16 102:18 108:5 117:7 127:4 131:14 now-completed 31:1 Number 6:18 57:8 61:11,17 78:9 96:7 97:5 107:10,16</p>
		<p>O</p> <p>Oath 64:18 Object 34:2 34:2 35:7 35:7 52:19 59:2 80:10 102:13 103:20 121:18 137:3 Objection 17:9,10 18:7 20:9,17 21:8,</p>

<p>18,19 22:13 22:13 23:3,4,17,18 24:4, 5 25:7,15,16 26:8, 9 27:12 28:18,19 31:6 32:7,8 33:6, 15 35:13,14 38:10, 11 39:9 40:2,20 41:10 42:2,9 43:14 44:3,16 45:11 46:3 47:13,20 48:5,6,17, 18 51:2,3 53:6,14 54:3,12,20 55:8 56:1,11,21,22 57:10,19 58:3,17 59:9 60:2,10,18,19 63:1,8,10 64:14 66:5 67:5 68:20 69:16 70:1,15 71:6, 14 72:13 73:8 75:9 79:19 82:9 83:1,4 84:1,16 85:2,11,16 86:4 87:17 89:13 90:10,21 91:15 92:7,22 93:13 94:15 95:3 96:2,16 97:10 98:8,15 99:11 100:21 101:10 103:3 104:8 106:3,4,17 107:2 108:15,16 109:15, 16,22 110:8,9,22 112:1 115:17 118:9, 16 119:9 120:2 121:8 122:18,22 123:11 125:12 127:11 128:2,4 131:8 132:21 133:8, 21 134:13 135:3,9, 15 136:3,19 137:10, 22 138:6 139:14 objections 23:12 26:1 32:19 38:18 49:6,15,20 50:10 51:13 106:9 obligated 33:22 34:19 occasion 32:21 occasionally 19:17 occur 122:21 October 8:5</p>	<p>off 13:20 14:10 37:3, 6,9 39:18 41:4 42:3 61:9 107:8 140:1,4 offensive 95:10 97:17 98:18 121:14 122:3,8,11,17 123:4,9,13 124:6, 13 125:18,22 126:12 129:8 130:9 offer 102:21 offered 29:21 OfferUp 64:19 103:7 often 97:22 oftentimes 96:7 often-vague 128:11 once 13:17 14:3 68:17 78:15 79:2,7 85:9 95:21 108:11 one 9:2,10 15:5,16 16:13 19:15 25:10 31:16 34:16 35:17 39:12,20 43:21 54:11 55:2 67:3 75:7 76:11 77:12 77:12 92:13 94:13, 21 95:18 95:18,19, 21 96:12 97:17 100:10 101:17,18 102:20 108:13 110:20 113:10 114:3,9 115:18 116:19 120:13 121:5 122:5 123:18, 20 124:19 125:11, 13,18,22 126:4,20 129:16 130:4,11 one-pagers 19:16 ones 71:3 114:7 ongoing 16:14 online 14:5 14:5 55:19 88:5 only 41:15 50:2 51:5, 15 58:6 113:4 124:22 126:3 onto 50:6 103:9 104:3 op-ed 18:11 38:22 39:5,7 open 74:15,20</p>	<p>operate 73:18 operates 34:12 operating 53:15 opinion 106:22 opinions 119:2 opponents 19:5 oppose 43:2,5,8 opposed 42:11,14,20 43:8 opposing 43:4 opposition 38:13 41:5 42:6,7,15,21 45:7 48:9,21 62:15 order 19:2,21 20:3 24:9 32:15 43:4 55:22 68:18 69:10 70:21,22 71:2 72:2 76:17 85:13 92:20 98:14 ordinary 28:6 original 19:14 123:19 125:15 126:15 132:14 other 9:4 11:12 15:14 16:4,18 18:22 19:1,20,20 20:16 21:3 22:18, 19 23:1,2 30:8,12, 18 31:4,11 34:16 35:18,21 36:12 38:15 39:16 41:3,5, 7,21 43:10 44:15 45:8 47:8,10,18 48:2,14 49:2,3,8 51:10 73:1 75:1 78:3,11 91:10 92:14,18 95:9 99:18 110:6 111:15, 17 116:13,15 117:4, 14 121:3 126:11 127:7,12 129:22 131:4,18,20 133:3, 16 134:11,14 135:4 136:5 other's 35:20 others 81:7 ourselves 89:18 out 93:16 99:13 116:20 122:15 126:14 129:13</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>137:20 138:18 139:4 outlines 132:15 outlining 38:20,22 outreaches 47:5 outside 20:19 24:8,18 25:2 35:18 53:18 92:20 113:2,10 114:16 over 8:10,15,17 9:4 10:15 15:15 25:12 36:9 44:12,20 51:20 52:1 61:4 87:19 123:17 124:17 overall 70:5 115:3 own 53:17 64:4 92:1 128:9</p>	<p>81:7 84:4 90:5,6 91:2 102:12 106:14 110:6 115:3 116:11 118:20 particular 81:16,17 particularly 35:9 parties 93:3,10 partner 31:3,8,12,15 35:18,22 parts 20:12 76:17 137:2 Pass 139:18 passage 50:1 passed 41:8 43:13 passing 17:8 38:8,17 39:13 41:22 42:8 password 78:10 past 8:14 31:1 Paxton 6:15 pay 21:4 29:8,17 32:4,9,13,21 33:10,12,16 34:13 39:7 42:6,10,15,20 43:2,3 paying 32:14 PayPal 64:19 PCs 58:7 people 52:14 55:18 69:1 75:1 per 99:15 percent 49:9 106:15 perhaps 42:14 Permanent 27:8 96:6 permanently 41:14 permit 75:7 101:7 person 44:14 personal 75:6,10 77:7,10 84:13 94:12,20 113:15 personally 76:2 114:3,14 pertinent 40:9 40:9 138:8 phone 44:17 46:9 47:8 78:9 phrase 27:21 94:5 Picture 88:4 piece 28:10,12 80:7 pile 36:12 Pinterest 64:19</p>	<p>place 14:9 44:14 46:1 55:18 62:14 79:11 95:22 99:2 100:12 Plaintiff 7:12 30:8,11 plaintiffs 7:8 37:17 plat 106:20 platform 32:14 52:14 55:7,10,16,17,22,22 56:3,6,7 57:18 58:4,5 59:8,11,15 64:5,8,10,12,22 68:19 75:21 76:4 78:18,19 100:16,20 platforms 21:4 32:6 34:1,14 35:12 46:11 52:8 55:13 57:15 68:13 75:8,12,18 77:2 88:3,5 100:10,22 123:10 130:10 play 33:3 please 7:6,14 8:2,17 9:18 33:8 70:18 78:20 79:21 117:14 126:15 129:1,12,12 130:14 135:13,17 139:6,22 pleased 9:18 point 52:5 61:7 74:3 105:9 131:9 pointing 87:7 policies 67:17,20,22 68:4 71:2 73:18 79:10,13 80:2,6 82:4 83:13 111:9 118:6 119:8 122:6 policy 11:4,13,17,20 76:16 88:8 89:19 political 83:19 politician 83:18 posed 10:3 position 10:14 56:18 60:15 93:9 123:8 positions 128:20 possible 9:4 31:10 40:17 115:9 possibly 78:9 post 13:1 52:15 55:5,</p>
<p>P</p> <p>p.m 6:22 37:8,12 61:12,18 107:11,17 140:1,4 page 74:3,6,8 104:5 pages 73:21 pagination 74:10 paid 21:1 papers 19:15 93:10 paragraph 38:1,4 51:22 52:6 61:3,20,21 62:2 63:5 64:11 65:22 67:17,19 68:3,6,11 73:20 74:4,14 87:4,8 93:21 95:18 104:22 105:4,7,12 121:13,17,21 123:4 124:11 125:4 126:20 127:15,18 128:15 129:4,14 Parler 52:8,11,14,17,21 53:4,8,13 54:2,5,13,19,22 55:4,14 56:20 part 13:3,4 26:11 33:20 34:16 38:21 48:20 54:5 56:13 58:18,20 65:8 72:16 77:15,17,21</p>		

<p>18 posted 32:1 103:12 123:10 posting 115:20 potential 19:6 76:12 potentially 47:6 86:17 131:10 power 29:13,15 131:14 practice 88:7 practices 90:12 108:14 117:20 118:19 119:7 120:14,19 121:5 123:20 126:2,8,21 127:9,14,21 129:7 130:2,5 131:6 133:19 135:1 136:13 preliminary 37:18 preparation 24:22 presence 105:17 present 56:10 99:22 103:18 130:9 presented 76:15 preserve 25:7 president 10:12 11:2, 8 presume 93:16 prevent 45:13 86:19 previously 10:22 11:1 43:15 59:10 133:9 primarily 22:21 40:5 primary 55:21 56:3 printing 19:17 prior 11:17,19 25:3 87:21 95:5 97:16 108:12 111:2 118:11 privacy 17:3,7 18:6, 12,18 76:16 79:13 88:8 111:8 private 57:2 58:20 88:7 pro 34:4,8 procedures 101:1 process 17:8 38:9,17 39:14 41:9 42:1,8 43:13 46:15 48:4</p>	<p>76:3 77:15,21 100:11 101:2,4,5 produced 113:18,20 114:4,7,14,17 138:13 production 39:2 products 103:18 104:12,17,19 programmer 72:1 87:22 programmers 99:13,17 100:4,7 129:19 programming 73:11 programs 88:13 projects 23:6 promise 123:17 124:16 promote 22:21 25:18, 21 26:13 32:5,15 39:7 69:3 81:3,6, 15 83:19 promoted 31:16 promotes 17:18 promoting 21:10 23:7 33:18 35:20 66:8, 16 77:3 83:14 promotion 81:10 propaganda 95:9 proponents 19:5 proprietary 115:22 protected 24:18 Protection 18:20 107:20 108:1 protections 27:14 46:20 56:16 provide 22:7,8 23:15 43:7 70:21 77:8,14, 17,20 78:1,12 87:10 89:11 90:5 92:16,17 104:11 111:6 115:5 116:7 133:5 135:2,13 136:4,12 provided 15:14 17:2 32:3 45:5 71:8,11 78:16 providing 78:3 124:19 134:9,11 136:18 provisions 124:7,20</p>	<p>125:1 126:1 128:7, 11 public 21:15 74:16, 21 75:7,17 76:3,8 77:8,13,16 78:17 publication 13:6 31:18,20 82:12 publicly 40:21 111:8 publish 35:1 82:18 published 18:11 38:22 39:5,13,17 40:8,22 publishing 38:20 41:6 purpose 86:15 111:16 132:3 134:4 purposes 9:1 26:12 36:19 40:3,4 111:18 131:14 pursuant 82:3 pursuing 88:4 pursuit 23:6 put 9:12 102:6 Putting 64:9</p>
Q		
		<p>qualify 42:17 question 9:3,12,16, 19 10:3 15:6 20:7 24:20 28:21 33:8 40:14 42:11 54:16 59:5,6 63:3 68:2 70:4,16 72:20 81:21 82:1 85:4 91:22 92:12 118:11, 14 123:19 125:16 126:9,15,16 128:17, 22 130:19 132:14 135:17 136:1,20,22 137:1 questions 10:1 25:5 question's 53:21 75:22 80:16 120:5 quick 107:6 quickly 36:3 quid 34:4,8 quite 13:1 quo 34:5,8 quote 106:13</p>

R racial 124:14 radio 13:7 raise 31:19 raised 62:18 range 96:8 rarely 29:20 rea 137:1 reach 21:16 22:1 131:11 133:6,12 136:8 read 38:2 122:13 123:16 124:16 126:14,18 129:13 135:13,16 136:2 Readme 73:1 ready 38:3 52:2,4 73:22 87:5 105:2 real 77:17 really 59:18 75:14 122:15 123:16 reason 117:8 reasoning 133:17 reasons 97:3 133:20 134:10 136:12 recall 13:19 14:10 15:3,6,10,13 16:20 17:1,5 18:9 35:4,6 39:6,21 40:1,17 41:1 112:15,17 receive 22:11,18 23:5 receives 22:15,20 29:4 recess 61:13 107:12 recognition 97:21 recognize 72:3,4 record 8:2 25:7 35:11 37:3,7,9,11 61:10,15 107:9,14 140:1,4 recorded 46:11 referred 121:22 138:4 referring 62:12 94:5 113:22 reflect 113:15 reflected 124:3	regard 46:18 67:7,11, 12 88:16 137:13 regarding 40:13 46:22 47:11 48:15 49:14 62:8 67:17 Regardless 29:12,14 80:8,22 82:21 regards 40:18 45:3, 10 46:14 119:7 137:8 regularly 78:7 89:20 90:11 91:16 92:1 93:2 regulations 109:19 rejected 34:22 35:2 relate 123:21 related 70:13 71:12 72:11 73:2,6,14 relates 126:9 relation 18:5 38:8, 16 39:13 41:8,22 42:7,21 43:12 releases 31:18 relied 114:17 rely 87:10 105:21 remain 29:22 remember 15:4,9 43:20 64:6,7 107:19 112:13 removal 48:10 remove 81:13 removed 62:3 93:17 repeal 111:22 repealing 111:18 repeat 70:17 repelling 94:9 rephrase 9:17 26:10 60:4 76:19 137:1 report 89:12 reporter 7:4,14 9:2, 7 36:20 37:21 135:12 reporters 12:19 reporting 93:9 reports 90:14 91:5,6, 8 represent 53:11 57:14 58:13 representative 74:16	Representatives 13:13,15,18 represents 139:8 reprogrammed 98:17 reprogramming 99:2,4 reputation 94:11 reputations 94:2 request 22:5 requested 126:16 requests 85:20 102:6 require 90:4 115:8 122:8 123:12 131:10 132:1 133:6, 12 134:1,18 135:7 136:8,21 required 33:22 77:16, 20 78:1 90:2 95:13 99:3 105:18 110:14 120:19 129:6 135:6 requirement 96:20 requirements 131:12 requires 110:10 123:9 requisite 99:18 residents 110:11 resources 19:4,9,10, 21 20:3,16 31:13 respect 27:16 98:12, 16 respond 136:14 response 114:7 responsive 135:14 restricting 24:9 result 34:20 95:13 99:7 99:7 105:19 110:6 122:21 results 104:11 105:14 retain 20:19 99:12 revenue 22:19,20 23:1,6,10,16 25:11 28:15 96:10 96:10 97:19 105:14,22 review 19:16 24:21 25:3 37:4 47:1 55:6,18 69:7,10 85:8 86:3,9,17 99:5 111:1,8 114:3, 14 120:20 reviewed 40:13
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>100:13 114:5,6,6,9, 11 reviewers 129:6 reviewing 37:1 90:13 reviews 90:11 91:1, 16 92:1 93:2 Rice 87:21 rid 111:12,14,16 right 8:21 16:14 27:15 29:13,18 33:14 58:20 61:22 65:9 79:11 80:4,18 90:20 105:5 108:5 113:11,16,19 117:6 120:1,11,17 122:1, 3 131:14 132:7 rights 26:20,22 58:22 robust 59:11 role 10:19,21 11:4 33:3 rules 8:11,15,17 9:2 Rumble 52:8 55:14 run 58:8</p>	<p>74:20 93:6 94:6 96:18 99:14 100:18 113:22 124:9 131:10 133:15 saying 27:10 30:2 101:11 107:22 124:7,22 says 52:6 55:12 65:14 87:8 106:13 122:1,4 124:5 school 12:5,7 science 87:21 Scope 17:10 18:7 20:6,9,17 21:19 22:14 23:4,18 24:5, 18 25:2,16 26:9 28:19 32:8 34:3 35:8,14 38:11 40:2, 9 41:10 42:2 43:14 48:6,18 51:3 56:22 60:19 93:13 106:4 108:15 109:15 110:9,22 132:2 134:3 scratch 108:4 screening 86:14 search 32:17 32:17 second 38:2 64:10 87:7 96:14 110:20 second-to-last 52:5 see 41:18 52:9,10 66:8 74:18,19 87:12,13 94:3,4 95:13 101:9 102:3, 4,22 103:10,11 104:4,14,20 Seeing 40:7 seeking 102:9 seeks 104:11 seem 40:9 seems 34:8 seen 28:5 32:16 sees 26:18 82:14 select 81:15 self-harm 95:8 sellers 103:12 Senate 13:13,22 14:3, 4,8 Senator 50:12,19 51:6,19</p>	<p>sense 28:8 32:18 42:22 82:8 sentence 52:6 87:8 93:22 124:10,11,19 125:3 126:20 127:15,18 128:14 129:3,14 separate 34:15 September 112:12,16 113:8 service 72:17,18 75:20 76:9,16,18, 21,22 77:18 78:4, 16 79:5,12,14,17 80:20 88:7 99:6 services 21:2 27:17 44:21 45:15 53:18 73:19 75:2,5 87:10 88:9 97:18 115:21 set 71:18 sets 71:12,16,22 72:1,5 several 73:17 75:11 91:9 92:14 97:3,5 share 84:21 shared 69:13,18 70:8, 10,13 72:10,15,22 73:5,10,13 87:1,2 137:17 sharing 19:18 31:13 31:13 shopping 103:11 104:4,5,5 should 114:22 show 102:7 103:17 shown 104:10 shows 138:13 sic 54:22 side 34:9 sideload 53:16 sign 72:18 75:2 77:15 signed 113:8 signing 77:8,21 similar 66:18,20 67:4,11,20,21 73:1 similarly 32:12 simply 40:16 92:17 134:11 136:14 Simultaneously</p>
<p>s</p> <p>sad 14:12 said 18:18 43:21 54:9 63:22 65:11 86:12 97:4 108:3 128:9 129:18 sake 36:2 Sam 8:4 same 8:19 23:12 26:1 29:4,6,8,10,15,17, 22 30:2 30:2,4,5 32:19 38:18 42:9, 19 49:6,15,20 50:10 51:13 54:16 54:16 58:3 66:4,13 67:17,20 68:4 82:21 85:16 100:14 103:1 106:9 109:22 122:22 say 16:12 19:9 26:16 30:1 31:21 57:15 58:12,14 59:15 60:3,5 63:22 65:22 70:20 71:3,22</p>	<p>screening 86:14 search 32:17 32:17 second 38:2 64:10 87:7 96:14 110:20 second-to-last 52:5 see 41:18 52:9,10 66:8 74:18,19 87:12,13 94:3,4 95:13 101:9 102:3, 4,22 103:10,11 104:4,14,20 Seeing 40:7 seeking 102:9 seeks 104:11 seem 40:9 seems 34:8 seen 28:5 32:16 sees 26:18 82:14 select 81:15 self-harm 95:8 sellers 103:12 Senate 13:13,22 14:3, 4,8 Senator 50:12,19 51:6,19</p>	<p>sharing 19:18 31:13 31:13 shopping 103:11 104:4,5,5 should 114:22 show 102:7 103:17 shown 104:10 shows 138:13 sic 54:22 side 34:9 sideload 53:16 sign 72:18 75:2 77:15 signed 113:8 signing 77:8,21 similar 66:18,20 67:4,11,20,21 73:1 similarly 32:12 simply 40:16 92:17 134:11 136:14 Simultaneously</p>

102:10 118:22 since 121:21 single 75:19 114:9 sit 96:12 115:14 131:17 134:21 136:15 137:6,19 139:12 site 44:13 76:17,20 79:3,4,8 80:8 100:1 101:15,20 102:8 102:8 103:14 104:4,9,15,16,20 123:5 sites 35:1 45:15 46:19 75:4 105:19 107:1 sitting 76:5 six 11:16 size 29:12,14 skip 8:14 social 16:10,12 31:19,21 32:13 52:8,14 55:7,10,13, 15,17,22 56:3,6,7 63:16 64:5,8,9,12, 22 78:22 88:3 96:20 software 73:2 88:2 solely 86:2 100:12, 13 127:17 solicit 22:3 Solutions 7:2,5 Some 12:14 28:5 29:19 44:15 45:15 61:4 75:1 81:6 89:12 101:1,3,4 110:13 129:5 somehow 24:17 someone 78:12 something 26:17 27:1 42:16 45:20 sometimes 20:11,19 21:1 23:5 26:10 66:17,18,19,20 68:9 69:1 83:16 somewhat 103:1 somewhere 115:16 soon 99:22 sorry 12:16 19:15 20:22 25:10 38:21	38:21 40:4 47:15 72:21 74:11 76:18 85:3 86:11 94:7 114:6 118:10 129:5 132:17 sort 19:9 23:15 54:16 85:7 89:12 90:7 96:14 source 70:12,17,20, 21 71:3,9 sources 23:1 76:13 space 55:19 106:21 spammers 86:19 116:21 speak 46:6,13,22 48:3,15 49:4,7 51:15 89:15 99:21 112:19 113:3 speaking 12:19 67:6 specialist 7:3 specific 21:15 23:6 25:21 70:4 71:15 83:10 88:12 104:12 115:15 116:15 117:4 127:7 130:21 131:18 134:11 specifically 10:16 21:21 26:6 53:22 86:13 116:20 118:4 127:20 129:7 specifics 68:12 specified 86:21 specify 117:9 speculate 94:17 95:2 speculation 132:1 134:2,19 135:8 speculations 115:9 speculative 131:10 133:5,12,17 136:8 speech 95:7,10 spell 8:1 51:8 spend 19:4,11 spent 106:16 108:18 spoke 39:19 41:6,11 43:22 45:12 46:16 48:7,19 49:9,13 50:15,22 62:18 113:1,5,9 spoken 47:9 51:11 stand 8:20 89:4	139:22 standards 72:16 80:21 81:15 82:13 90:14,22 91:2 98:20 117:2 start 13:11 14:19 107:22 112:8 121:4 started 112:14 113:6 starting 87:20 94:7 state 8:1 14:14,15, 17 16:10 27:5 121:13 state/federal 17:21 stated 116:10 121:12 129:20 130:2,6 133:9,20 137:13 statement 57:21 125:21 statements 13:6 113:14 115:3 States 6:16 13:13 83:7,11 110:6,21 122:10 status 83:17 statute 47:7 Steve 51:6,16 still 27:3 66:2 74:4, 14 stop 61:6 85:18 86:18 115:20 116:4, 14 store 52:17,21 53:1, 5,9,13,19,22 54:2, 5,7,14,19,22 56:10, 13,15 58:14,16 59:17 60:1,6,9,13, 17 Street 6:20 strike 61:2 structure 53:19 StubHub 64:19 studies 90:12 subdivision 15:7 subject 16:13 70:11 72:8 74:16 75:2 79:4,9,12 138:21 submit 35:12 submitted 37:17 114:12 subsection 74:4,14
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>subsidiary 64:1 77:1 79:15</p> <p>substance 69:14</p> <p>substantially 118:11</p> <p>such 19:15,16 70:10 72:8 96:5 111:2 112:2 116:21 121:15 121:15 134:1 136:7</p> <p>Sue 7:4</p> <p>suffer 114:21 115:2 116:17 132:18 133:11 137:14 138:14</p> <p>suggestion 34:5 49:16</p> <p>suit 109:6</p> <p>Suite 6:21</p> <p>summarize 105:8,11</p> <p>Support 7:2,5 22:21 33:17 37:17 43:7</p> <p>supposed 72:4,5</p> <p>sure 8:16 30:7 54:6 61:8 68:15 80:18 85:6 107:7 112:8</p> <p>surprised 53:3</p> <p>swear 7:14</p> <p>sworn 7:18</p> <p>system 53:16</p> <p>systems 88:13</p> <p>Szabo 6:14 7:22 8:3 20:8 36:6 37:3,14 81:18 97:2 135:12 140:3</p>	<p>taking 127:4</p> <p>talk 9:4 73:22 74:5 87:5 121:21</p> <p>talked 32:15 35:17 43:11 78:15 96:15 97:2 103:1 117:9 119:21</p> <p>alking 19:10 28:16 30:16 38:4 61:20 62:7,9 69:14 71:4 86:13,22 97:6</p> <p>talks 93:22 105:4 132:5</p> <p>target 21:22</p> <p>Tax 27:8</p> <p>taxation 15:6,8,15</p> <p>taxes 27:6</p> <p>team 12:15</p> <p>technical 80:19</p> <p>technological 110:14</p> <p>tell 9:18 25:10 28:4 38:7 63:20 90:8 95:19 96:1 136:11 137:7,12</p> <p>telling 54:11</p> <p>ten 10:15,17</p> <p>term 31:10 62:11 80:19 130:15,16</p> <p>terms 29:9 30:2 72:17 74:16 75:20 76:15,16,21,22 77:17 78:4,16 79:5, 9,12,14,16 80:20 83:20 88:7 99:6 136:17</p> <p>testified 7:18 13:8, 12,17 14:3,15,17, 20,22 15:18,20 16:1,4,6,9,16,18, 21 38:12</p> <p>testify 10:6 14:1 15:2 128:19</p> <p>testifying 8:20 41:5 48:8</p> <p>testimony 8:19 13:14 14:8 15:14,22 17:2 26:13 45:6 48:20</p>	<p>49:2 84:11 140:2</p> <p>Texans 52:6</p> <p>Texas 6:17 14:19,20, 22 15:15 38:13 45:6 48:3,7,9,15 49:4,8,10,14,22 50:22 51:11,16</p> <p>text 47:19</p> <p>than 15:15 19:20 22:19 23:2 41:5 47:8 49:2 57:12 70:5 78:3 81:20 83:6,16 88:10 91:10 92:18 106:15 110:5 116:13 117:14 126:11 131:20</p> <p>Thank 8:6 18:14 28:14 30:6 36:10 37:22 65:19 74:7,9 111:19 129:15 135:18</p> <p>Thanks 83:9</p> <p>that's 14:12 16:14 20:5 27:10 28:2 30:15 37:5 49:19 97:5 112:6 129:17</p> <p>their 26:21 27:15,17 32:6,13,14 34:1 41:12,13,15,17,17 43:4 44:11,13,19, 21 45:14 46:17,19, 19 48:10,11,20 52:17 53:17 57:2,3 62:20,22 66:3,7,8, 9,10,14,15,16,16 67:7,11,13 68:7,8, 13,22 69:3,4 71:2, 12 72:15,16 73:6, 10,18 74:16 75:2,8, 12 77:14,17,20 78:2,3 79:4 81:14 82:18 83:17 88:12, 13,15,17,18 89:12, 16,16,18,21 90:3,9 91:2 92:2,9 94:8 98:10,13,16 99:20 102:3,4 104:2,3 108:13 118:2 118:2 119:7,13,16,19,19</p>
<p>T</p> <p>tab 36:13,21 37:21</p> <p>table 9:12</p> <p>tablets 58:7</p> <p>take 9:9,13 14:8 38:16 44:14 46:1 93:8 98:3 99:2 106:15,21 107:6 128:6 138:16</p> <p>taken 6:14 8:7,9 61:13 107:12</p> <p>takes 95:22 99:15 100:11 126:13</p>	<p>testified 7:18 13:8, 12,17 14:3,15,17, 20,22 15:18,20 16:1,4,6,9,16,18, 21 38:12</p> <p>testify 10:6 14:1 15:2 128:19</p> <p>testifying 8:20 41:5 48:8</p> <p>testimony 8:19 13:14 14:8 15:14,22 17:2 26:13 45:6 48:20</p>	

<p>120:15,21,21 121:1 121:1 121:1 123:6 130:21 134:16,17, 18 135:6 136:6 137:15 137:15,16 138:15 themselves 7:6 70:6 90:20 91:7 92:18 then 9:3,13 33:13 34:12 36:20 61:2 72:2 79:9 98:3 128:15 there 14:1 19:1 21:15 25:8 28:1,5 31:11 34:8 35:5,21 36:2 39:22 40:15 41:7 42:13 45:8 46:4,21 51:10 52:9, 10 56:18 59:11 74:4 75:16 76:4 89:10 93:22 106:12 114:13,16 115:14 117:8 118:6 121:3, 15 127:7,12 137:6, 11,19 138:18 139:4, 11,16 there's 28:2 34:9 100:11 120:7 138:1, 7 these 19:13 21:6,9, 16 33:4 34:15 44:14 50:15 51:18 62:8,13,14,21 63:3, 6,20 64:10 66:3,6 67:16 68:16 69:9, 13 71:1 76:22 77:2 89:7 92:21 93:8 97:17 106:20,21 117:9 120:10 123:10 they're 28:2,3 35:19 72:7 83:12 things 85:19 90:13 115:9 think 18:16 20:5 32:2 34:7,17 41:3 66:15 68:7 70:16 78:11 81:16 92:13 103:19 104:4 117:6 129:18 137:20</p>	<p>139:13,21 thinking 136:16 third 59:19 93:3,10 third-party 49:12 those 12:13 18:5 19:18 24:12,16,22 25:1 26:6 34:14 35:2 41:1 44:1 46:10 50:8 55:20 58:15 62:13 70:7 71:3 75:4 79:14,16 80:3,6 82:20 83:22 86:15,22 87:1,2 89:8 90:18 91:6 92:5 95:12,19 104:6 107:1,4 109:1,5 113:4 114:16 117:20 118:7 119:2 125:7 126:11 133:19 thousands 96:8 threat 26:18,19 27:10 28:7,10,11, 13 threats 26:3,7,16 27:17,22 28:3,5,6 118:20 through 17:8,22 18:1 21:2 38:8,17 39:14 41:9 42:1,8 43:13 53:18 76:13,14 85:4 86:2 TikTok 64:19 time 9:11 13:15 14:12 16:20 25:10, 14 37:3,8,12 39:17 46:22 59:19 61:4, 12,18 81:19 89:5 92:14 107:11,17 113:6 139:20 times 14:1 31:17 73:17 92:14 title 10:9,10 11:18 titles 12:13 today 8:19 10:5,7 76:5 96:12 115:14 131:18 134:21 136:15 137:6,12,17, 19 139:12 today's 140:2</p>	<p>Todd 7:7 37:2 63:10 128:4 told 19:3 49:2 100:3, 6 133:2 took 41:8,22 43:12 62:14 108:6,7,11 top 13:20 14:10 39:18 41:4 42:3 74:8 top-down 101:2 topic 13:15 86:14 topics 14:2 15:4 16:4 24:10 towards 23:7 trade 17:16 33:4,21 90:6 105:16 train 72:3,6 training 71:12,16,17, 22 72:5 transcript 36:7 transparency 90:13 91:5,6,8 travel 26:12 TravelTech 64:20 treat 83:5,6,11,16 110:5,11 treated 82:21 treating 82:2 110:18 tried 42:17 Truck 64:17 true 37:16 59:21 truthfully 10:6 try 9:3,9 35:1 92:12, 13 trying 19:4 21:16,22, 22 27:22 71:1 74:12 105:10,11 122:15 125:15 turn 38:1 95:16 Turning 93:21 Turo 64:20 tweet 32:1 Twitter 21:2,3 32:1 64:2,20 97:16 98:3, 6,9,12,21 99:3,10, 12 100:1,3,6 Twitter's 98:4 two 28:1 34:15 55:20 90:17 103:7 106:20, 21 113:4 117:9</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>136:21 137:2 type 71:1 82:15 97:17 102:8 104:10 126:21 types 125:7 typo 65:15</p>	<p>69:6,9,20 76:10,16 80:11 87:10 99:4 101:16 102:7 used 18:16 20:3 27:21 28:16 31:19, 21 70:21 72:6 84:9 86:15,16 113:20 114:7,11 120:9 130:15</p>	<p>96:19 value 41:17 values 21:10 26:13 117:1 118:2,21 119:1,13 120:21 121:1 124:2 125:8 134:18 137:15 138:16 various 19:13 20:12 114:20</p>
<p>U</p> <p>Uh-huh 93:19 ultimately 105:14 unable 24:21 136:4 unavailable 54:14 unaware 54:13,21 unclear 9:19 97:12 under 26:22 41:14 48:12 50:4 56:15 58:22 64:12,21 81:8 98:19 105:18 119:20 120:18 124:12 135:6</p>	<p>useful 81:17 user 76:4,11 77:15, 22 78:2,5,13 79:8 80:8,22 81:11,16, 17 82:22 83:12,17 84:19 85:8,9,18 86:17 101:14 102:9 103:9,13 104:12,18</p>	<p>versus 6:15 16:13 28:6 67:3 110:19 very 36:3 81:21 136:22 vice 10:12 11:1 video 6:13 7:3 44:18 46:9 47:8 view 57:1 104:7 105:9 120:22</p>
<p>underlying 72:17 76:9 understand 8:18,22 9:16 10:2 14:13 27:22 30:7 40:12 42:13 56:7 67:2 75:22 88:12 100:11</p>	<p>user-created 78:10 user-generated 66:4 68:17 69:7,10 70:7 80:7,17,19,22 100:9</p>	<p>viewers 22:7 viewpoint 54:7 56:15 58:21 80:12 81:4 83:19 84:5,7 91:3</p>
<p>understanding 100:15 127:4 Understood 9:15 18:19 27:20 29:2 Unfortunately 42:18 unintended 19:7 unit 61:11,16 107:10, 15</p>	<p>12,20 76:12,13 77:4,5,20 78:1,5 79:2,8,12,18 80:13 82:4,14,16,20 83:5, 6,11,22,22 84:4,6, 12,22 86:14,15 87:10 94:9 95:5,10 96:21 98:1 99:8</p>	<p>viewpoints 66:9,17 68:8 69:4,19 75:4 77:4 81:7 83:15 86:8 88:18 98:21 102:11 119:1</p>
<p>United 6:16 13:13 83:7,11 110:6,21</p>	<p>101:7 102:2,6,17, 21 104:2,3,6,9,14, 19 110:5 110:5,15, 19,21 119:19 121:1</p>	<p>views 70:5 viol 88:5 violate 23:20 25:5 28:21 41:17 63:3 112:3 118:21 120:21</p>
<p>University 12:6 87:21 unleash 50:5 unless 90:18 unquote 106:16 update 70:22 89:17 99:6 129:6</p>	<p>uses 86:5 using 78:21 91:18 104:9,16 125:3</p>	<p>violates 26:20 27:13 39:1 50:2 81:14 82:12 violating 24:14 82:15 83:13</p>
<p>updates 90:3,5 use 26:11 37:21 42:18 44:7 52:7 55:13 57:16,17 62:11 68:11,22</p>	<p>utilized 73:2</p>	<p>violation 27:7 46:19 77:18 violations 88:3,5 Virtually 75:19 visit 76:13 77:6 79:13 visiting 76:14,20</p>
	<p>vagaries 47:7 63:15 96:17 131:11 vague 18:16 72:21</p>	<p>Vrbo 64:20</p>

W		
wait 9:2	18:2 19:7,17 32:12	135:4 136:5,12,17
want 8:15 37:20 38:1	33:10 41:17 42:13	while 17:7 38:16
52:5 59:5,19 74:3	43:10 55:12 61:2	41:22 46:14 48:4
75:14 81:18,19	67:14 71:20 77:3,	64:4
95:1 98:5 101:9	12 78:21 80:2,12	who 15:2,8 19:18
102:4 104:20 137:7,	86:8,19 88:3,9	21:22 21:22 22:21
12	91:18 92:2 98:5	42:11,14 44:1
wanted 65:7	99:4 101:14 105:9	49:13 50:21 62:9
wants 34:13	108:4 119:15,21	71:17 80:8 82:20,
Washington 6:21 12:9	120:6 125:15 132:5	21 83:12,22 112:18,
wasn't 130:19	we'll 17:15 25:7	19 113:3,22
way 9:17,20 18:16	61:2 121:21	whom 62:18 99:13
22:3,5 27:3 31:13,	went 12:6 95:4 100:7	whose 119:1
14 32:9,12 34:1,19	We're 37:6,10 62:16	Why 58:2 59:6 109:5
35:17 39:8 40:16	86:22 139:21	136:11 138:5
44:15 47:11 66:4,8,	Western 6:17	Wiki 73:1
13 68:11,12 78:21	We've 11:11 28:15	Wildman 12:3
82:21 91:13 101:8	69:14 81:20 86:21	Will 7:6,13 24:6,7,
102:5 103:1 105:10	119:21 131:20	15 25:5 28:21
110:12 119:18	whatever 9:12,18	34:18 36:4 46:7
120:9,13 122:6	27:3 130:16	53:11 63:6 66:17,
124:19,21,22 125:1,	what's 36:4 55:9,15	18 72:8,20 80:11
22 126:3,4 127:6	63:9 101:21 128:3	81:3,13,15 82:10,
130:7 137:2	Whereupon 126:16	13 83:5,11,15
Waymo 64:20	136:1	85:17 92:8 95:18,
ways 35:21 66:15	whether 27:14 31:13	21 96:1,4,18,19
67:10,12 81:3	59:7 76:14 79:16	99:22 100:16,18
98:18 101:11	97:12 100:12	102:8,10,15 103:16
115:22 117:1 118:4	102:20 136:14	104:10,16 109:7
119:6 120:20,22	which 13:10 15:6	114:21 114:21
121:3,9 122:6	16:16 21:11 23:15	115:2,6,8,13
123:19,20 124:4	24:2 31:11 35:17,	116:11,17 117:17
127:5,7,12,20	21 40:22 45:22	118:1,5,19,22
129:22 130:4 131:4,	53:17 63:5,20 64:1,	119:6,12 120:10,13,
18 132:6,8,9,15	10 67:2,3,10,12,14	15,18 121:4 121:4,
133:3,4,16,20	70:17 71:17 72:16	9 122:6,7,11,20
134:7,11,14,22	75:3,20 76:21 79:5	123:12 124:13
135:4 136:5,12,15,	80:22 91:13 96:6,	125:9 126:4,11,22
16	18 97:15 99:17	127:6,8,13,20
Web 55:5	100:13 101:7	129:4,5 130:1,5,9
website 13:2 76:15	103:11 105:15,21	131:5,10 132:6,9,
77:6 79:14 87:22	110:17,20 118:4	11,16,18 133:17
106:13	119:6 120:10,13,20	134:8 134:8,15,22
Websites 58:8 75:1	121:3,16 122:6,7	136:5 137:14
107:5	123:20 124:3,19,21,	138:13
weekly 88:11	22 126:1,4 127:5,8,	willing 106:22
Well 8:10 11:7,8	20,20 129:22 131:4,	willingness 107:4
13:13 14:6 17:15	11,19 132:2,6,8,10,	within 20:5 73:18
	15 133:3,4,16	98:13 116:7 117:10
	134:3,7,16,22	118:8 124:8 130:21

<p>131:2 without 24:14 witness 7:14,17 24:6 109:7 117:11 139:18 word 28:7 31:15 44:7 71:21 84:9 111:19 words 42:19 work 19:12 87:19 88:1,4,6,13 90:9 91:14 129:4,6 workflow 73:6,10,14 working 11:19,21,22 27:3 88:10 111:22 works 34:10 76:6 100:15 130:7 World 105:4,8,15 106:2,8,12 worldwide 106:16 write 25:14 99:6 writings 93:3,6,8 written 45:3,6,8,16, 18 51:20 68:22 86:6 89:11 wrong 56:19 </p>		
<p>Y</p> <p>Yahoo 64:21 year 14:8,11 15:10, 13 years 10:15,17 11:16 yet 27:2 137:17 you'd 36:12,20 137:1 You're 8:12 21:16 30:15 36:22 38:4 52:2 73:22 80:3 87:5 88:21 94:5,16 99:14,16 105:1 110:18 116:6 124:9 134:11 yourself 39:20 YouTube 64:1 you've 16:4 19:3 37:14 96:13 109:9 117:13 </p>		
<p>Z</p> <p>zebra 8:4</p>		